

### ST HELENS BOROUGH LOCAL PLAN 2020-2035

# COPIES OF REGULATION 20 REPRESENTATIONS (REGULATION 22 (1) (D)) DOCUMENT

### REPRESENTATION ORDER

RO1301 - RO1400

**SEPTEMBER 2020** 

**Representor Details** 

| Web Reference Number | WF0108  |  |
|----------------------|---|--|
| Type of Submission   | Web submission  |  |
| Full Name            | MR DEREK NEVIN  |  |
| Organisation         |   |  |
| Address              | 64 CROXTETH DRIVE RAINFORD SAINT HELENS WA118LA WA118LA |  |
| Agent Details        |   |  |

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

| Policy                               | St helens Borough local plan 2020-2035 |
|--------------------------------------|--|
| Paragraph / diagram / table          | Plant 2020-2033                        |
| Policies Map                         |  |
| Sustainability Appraisal / Strategic |  |
| Environmental Assessment             | ,                                      |
| Habitats Regulation Assessment       | E                                      |
| Other documents                      |  |

4. Do you consider the St Helens Borough Local Plan 2020-2035:

| Is legally compliant?                | No |  |
|--------------------------------------|----|--|
| Is sound?                            | No |  |
| Complies with the duty to cooperate? | No |  |

#### 5. If you consider the Local Plan is unsound, it because it is not:

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

There are no exceptional circumstances to justify not using the standard method to calculate housing need

- The economic analysis is flawed and based on over-optimistic assumptions
- The level of land needed is therefore not as high as set out in the Local Plan
- Therefore there are no exceptional circumstances to change Green belt boundaries
- Other reasonable alternatives have not been fully explored, including lower target figures and using more previously developed land
- These alternatives will have less impact on the environment and lead to less need for new infrastructure
- The Council have failed to co-operate with other councils and have not published any statement(s)
  of common ground.

Rainford Specific points (HA8 Rookery Lane)

- Only 4 sites score 4 negatives\* (red) on the Sustainability Appraisal, and the other 3 have all been discarded. So SHBC's own assessment is that HA8 is the least appropriate Green Belt site allocated for housing in Phase 1
- This site is next to an Industrial area and subject to the risks associated with industrial activity such as pollution and even explosions, both of which have been recorded recently. Other sites have been

22

excluded during the site assessment phase due to being next to similar industrial employment land – for example see SHLAA 2016 site assessment ref 16m & 142.

- The site is Grade 1 Agricultural Land and is actively farmed and provides employment in the
  agricultural sector which are threatened by the proposed removal of this site from the Green Belt.
  The SHLP is intended to promote employment and economic growth yet this will have the opposite
  effect.
- 01
- There has been no consultation with Natural England over the loss of Grade 1 Agricultural (BMV) Land.

### 7. Please set out modification(s) you consider are necessary

There is no need to build on grade one arable land when the projected figures for the population of the Borough are on the decline. The housing you plan to build will not help first time buyers as they are far too expensive in the Rainford area, You have many brown field sites and disused properties in St Helens that should be considered first. The infrastructure roads, med centres, schools can not sustain the extra populous it is struggling as it is. there is also the problem with flooding in the area you ear marked to have houses surely concreting more fields and drainage would cause another of the road that took the council 2 years to repair you need to think about your seriously flawed plan and confine it to the file B1n where it belongs

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

| Response Date | 2/12/2016 15          |  |
|---------------|-----------------------|--|
|               | 3/13/2019 10:09:26 AM |  |

#### **Representor Details**

| Web Reference Number | WF0097           |
|----------------------|------------------|
| Type of Submission   | Web submission   |
| Full Name            | Mr R Nevitt      |
| Organisation         |                  |
| Address              | 12 Ribble Ave    |
|                      | Rainhill L35 ONJ |
| Agent Details        |                  |

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

#### 3. To which part of the Local Plan does this representation relate?

| Policy                               | St.Helens Borough Local Plan 2020-2035 |
|--------------------------------------|--|
| Paragraph / diagram / table          |  |
| Policies Map                         |  |
| Sustainability Appraisal / Strategic |  |
| Environmental Assessment             |  |
| Habitats Regulation Assessment       |  |
| Other documents                      |  |

#### 4. Do you consider the St Helens Borough Local Plan 2020-2035:

| Is legally compliant?                | Yes |
|--------------------------------------|-----|
| Is sound?                            | No  |
| Complies with the duty to cooperate? | Yes |

#### 5. If you consider the Local Plan is unsound, it because it is not:

Justified, Effective

### 6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

The physical roadway infrastructure does not currently cope with the demands of the traffic volumes.

The school places are in demand and cannot cope with predicted numbers.

The NHS Medical services are overstretched.

The increase in population will by definition increase the likelihood of vandalism, anti-social behavoir which the Police and emergency services cannot currently cope.

Local wildlife would be greatly impacted due to the loss of yet more green spce.

The local population would be adversly affected by the continued growth of urbanisation. This increase will without doubt lead to an increase in polluiton, which in tyrn will lead to increased demand on NHS services due to ill-health.

#### 7. Please set out modification(s) you consider are necessary

### 8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

| Response Date | 3/13/2019 12:04:10 PM |
|---------------|-----------------------|
|---------------|-----------------------|



# St Helens Borough Local Plan 2020-2035 (Submission Draft) (For official use Representation (i.e. Comment) Form

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: www.sthelens.gov.uk/localplan

Please ensure the form is returned to us by no later than 5pm on Wednesday 13th March 2019. Any comments received after this deadline cannot be accepted.

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

#### PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

| (we will correspond via your agent)  | 2. Your Agent's Details (if applicable)   |
|--|---|
| Title: MRS.  | Title:  |
|  | First name:   |
| Last Name: NEW COMBE   | Last Name:  |
|  | Organisation/company:   |
| Address: 115 HIGHER LANE   | Address:  |
| RAIN FORD  |   |
|  | Postcode:   |
|  | Tel No:   |
| Mobile No:   | Mobile No:  |
|  | Email:  |
| Signature:   | Date: <u>١७ . 3 . । 9</u>   |
| Please be aware that anonymous forms cannot be considered you MUST include your details above                              | be accepted and that in order for your comments to be   |
| Would you like to be kept updated of future st<br>(namely submission of the Plan for examination,<br>adoption of the Plan) | tages of the St Helens Borough Local Plan 2020-2035? publication of the Inspector's recommendations and |
| ✓ Yes (v <del>ia emait</del> )   | ☐ No  |
| Please note - email is the Council's preferred move will contact you by your postal address.                               | ethod of communication. If no email address is provided,  |

#### **RETURN DETAILS**

Please return your completed form to us by no later than 5pm on Wednesday 13th March 2019 by:

post to:

Local Plan

St. Helens Council

Town Hall Victoria Square

St Helens WA10 1HP

or by hand delivery to:

Ground Floor Reception St. Helens Town Hall

(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

#### **FURTHER INFORMATION**

If you require further information please see the FAQs on our website: www.sthelens.gov.uk/localplan

If you still need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk

Telephone: 01744 676190

#### **NEXT STEPS**

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

#### DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: www.sthelens.gov.uk/localplan

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

Rounfood.
St Helens.
WA 11 880.
9.3.19

hocal Plan St. Helens Comcil. Town Hall Victoria Square

.

Dear Si.

After visiting the doop in Centre in Rainford on JEH Leb. I am uniting to object to the proposed building of houses, hungalows a inclustrial development on one land boarding Rookery have a Higherhane. This is Al Aquicultaral land where food crops are grown each year. The government are asterna for more coops to be grown but how can this happen if land ban be taken away for housing etc?

Rainfood is not equipped for more houses etc to be built Already there are insufficient doctors, dentsk, Schools etc to cope with the mucho of people living here. The roads are congested especially at peak likes a the alterations at windle lights will not automatically resolve this. The bus services have been reduced which makes can be quel more heresary.

The facilities in Rainford house been reduced bow the years — the recycling centre closed down I the five station also a the police station has been reduced. Parking is also difficult which will be made woose with more cars in the village

Air a traffic possession will be made vorse a due wild life wite also suffer.

Rainford has always been an agricultowal village a should remain so I appreciate that people need to have somewhose to live, but I am sive there are peculy of empty proposties a brown field sites a varienble in the area.

I hope that all these points will be noted.

Gours sincerely.



# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

(For official use only)

Please also read the Representation Form Guidance Note that is available with this form, or online at: www.sthelens.gov.uk/localplan

Please ensure the form is returned to us by no later than 5pm on Wednesday 13th March 2019. Any comments received after this deadline cannot be accepted.

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

### PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

| Your Details    (we will correspond via your agent)   | 2. Your Agent's Details (if applicable)  |
|---|--|
|   | Title:   |
|   | Title:   |
| First Name: FRANCES   | First name:  |
| Last Name: Nowton   | Last Name:   |
| Organisation/company:   | Organisation/company:  |
| Parafood SEHalons   | Address:   |
| Postcode: WALL SEG  | Postcode:  |
|   | Tel No:  |
| Mobile No:  | Mobile No:   |
| Email:  | Email:   |
| Signature:  | Date: 9319   |
| considered you MUST include your details above.   | accepted and that in order for your comments to be   |
| Would you like to be kept updated of future sta<br>(namely submission of the Plan for examination, p<br>adoption of the Plan) | ges of the St Helens Borough Local Plan 2020-2035? ublication of the Inspector's recommendations and |
| Yes (via email)   | □ No   |
| Please note - email is the Council's preferred met  | thod of communication, If no email address is provided,  |

#### RETURN DETAILS

Please return your completed form to us by no later than 5pm on Wednesday 13th March 2019 by:

post to:

Local Plan

St. Helens Council

Town Hall Victoria Square

St Helens WA10 1HP

or by hand delivery to:

Ground Floor Reception

St. Helens Town Hall

(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

#### **FURTHER INFORMATION**

If you require further information please see the FAQs on our website: www.sthelens.gov.uk/localplan

If you still need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk

Telephone: 01744 676190

#### **NEXT STEPS**

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

#### DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: www.sthelens.gov.uk/localplan

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

#### PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

|   | in does this represe   | entation relate?   |  |          |
|---|--|--|--|----------|
| Policy Paragraph/ diagram table   |  | Sustainability Appraisal/ Strategic Environmental Assessment             | Habitats<br>Regulations<br>Assessment                                      | Object   |
| Other documents (please name document and relevant part/section   | on) Ref! and   | the hand South<br>Least of Roc   | of fligherho   | Zan      |
| 4. Do you consider the St Helen<br>Please read the Guidance note  |  |  | e Tests of Soundne   | SS       |
| Legally Compliant?  | ☐ Ye   | es No  |  |          |
| Sound?  | ☐ Ye   | es No  |  |          |
| Complies with the Duty to Cooper  | rate Ye  | es No  |  |          |
| Please tick as appropriate  |  |  |  |          |
| Positively Prepared? Justified? Effective?  |  | tis Not<br>It is Not<br>This site gradall)<br>providing empl             | agricultura  | ما ک     |
| Consistent with National Policy?  |  | the Course   | Jumpy and I  | OU       |
| 6. Please give details of why yo or fails to comply with the du If you wish to support the leguse this box to set out your confice hand is ploughed employment and for ploughed employment and for ploughed employment and for ploughed end by subject of the set of the subject of | u consider the Local<br>ty to cooperate. Ple<br>al compliance or so<br>comments. | al Plan is not legally corease be as precise as poundness of the Local P | mpliant or is unsou<br>ossible.<br>Plan, please also<br>ar, bamana<br>Wast | und<br>" |

| ease set out what modification(s) you consider necessary to make the Local Plan legally ompliant or sound, having regard to the matter you have identified at 6. above where this lates to soundness (NB please note that any non-compliance with the duty to cooperate is capable of modification at examination). You will need to say why this modification will make a Local Plan legally compliant or sound. It will be helpful if you are able to put forward your aggested revised wording of any policy or text. Please be as precise as possible. |
|--|
| would suggest, that the many brown sites in the area is built on; before our precious green belt is gone or ever.  |
|  |
| Please continue on a separate sheet if necessary   |
| Please continue on a separate sheet if necessary  e note: your representation should cover succinctly all the information, evidence and supporting ation necessary to support/justify the representation and suggested modification, as there t normally be a subsequent opportunity to make further representations based on the original sentation at the publication stage.   |

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

 No, I do not wish to participate at the oral examination

 Yes, I wish to participate examination

| nation, please outline why you consider |
|---|
|   |
|   |
|   |
|   |
|   |

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.



LPSD Ref:8HA land south of higher lane and east of Rookery Lane Rainford.N fran newton

to:

planningpolicy 11/03/2019 16:54

I object to the above proposal to build 259 homes on this Grade 1 agricultural land, which is ploughed, planted and harvested each year providing employment and fresh produce for the Noth West.

259 homes will mean at least 350 cars into an area that is already very busy each morning and evening. A fleet of double decker buses bring in children to Rainford High School their entrance and exit route is Rookery Lane which has a blind bend at the bottom, over the years there have been a number of head on collisions, extra traffic, i.e heavy vehicles will add to the danger.

Flooding also on Rookery Lane, has lifted heavy cast iron water main lids up onto the road.

Local Doctor's, Rainford Health Centre and Schools are at full capacity at the present time, where on earth will a possible 2,000 people go?





# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

(For official use only)

Please also read the Representation Form Guidance Note that is available with this form, or online at: www.sthelens.gov.uk/localplan

Please ensure the form is returned to us by no later than 5pm on Wednesday 13th March 2019. Any comments received after this deadline cannot be accepted.

This form has two parts;

1. Your Details

Part A - Personal Details

Part B - Your Representation(s)

2. Your Agent's Details (if applicable)

#### PART A - YOUR DETAILS

we will contact you by your postal address.

Please note that you must complete Parts A and B of this form.

| (we will correspond via your agent)  |  |
|--|--|
| Title: MRS   | Title:   |
|  | First name:  |
| Last Name: NEWTON  | Last Name:   |
| Organisation/company:  | Organisation/company:  |
|  | Address:   |
|  | - i  |
|  | Postcode:  |
| Те   | Tel No:  |
| M  | Mobile No:   |
| Er   | Email:   |
| Signature  | Date: 9 3 19   |
| Please be aware that anonymous forms cannot be considered you MUST include your details above                                | e accepted and that in order for your comments to be   |
| <b>Vould you like to be kept updated of future sta</b> namely submission of the Plan for examination, pudoption of the Plan) | ages of the St Helens Borough Local Plan 2020-2035' publication of the Inspector's recommendations and |
| Yes (via email)  | ☐ No   |
| 'lease note - email is the Council's preferred me  | ethod of communication. If no email address is provided  |

#### **RETURN DETAILS**

Please return your completed form to us by no later than 5pm on Wednesday 13th March 2019 by:

post to: Local Plan

St. Helens Council

Town Hall

Victoria Square

St Helens WA10 1HP

or by hand delivery to: Ground Floor Reception

St. Helens Town Hall

(open Monday-Friday 8.30am - 5.15pm)

or by email to: planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

#### **FURTHER INFORMATION**

If you require further information please see the FAQs on our website: www.sthelens.gov.uk/localplan

If you still need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk

Telephone: 01744 676190

#### **NEXT STEPS**

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

#### DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: www.sthelens.gov.uk/localplan

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

### PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

| 3. To which   | part of the Local Pla   | an does this repre   | sentation relate?  |   |
|---|---|--|--|---|
| Policy<br>PAOS<br>SITE<br>2HA   | Paragraph/<br>diagram<br>table  | Policies<br>Map  | Sustainability Appraisal/ Strategic Environmental Assessment   | Habitats<br>Regulations<br>Assessment   |
|   | nents (please name<br>nd relevant part/secti  | on)  |  |   |
|   | onsider the St Helen<br>ad the Guidance note  |  | Plan 2020-2035 is:<br>f Legal Compliance and the   | ne Tests of Soundness   |
| Legally Com   | pliant? DONT  | KNOW.  | Yes No   | 3 A CANCER  |
| Sound?  |   |  | Yes No   |   |
| Complies wit  | th the Duty to Cooper   | rate $\square$   | Yes 🖳 No   |   |
| Please tick a   | as appropriate  |  |  |   |
| Please rea  | OF ACCOUNTS TO STATE OF THE   | for explanations of  | f the Tests of Soundness   |   |
| Justified?  | oparca:   |  |  |   |
| Effective?  |   |  |  |   |
| Consistent w  | vith National Policy?   |  |  |   |
| or fails to   | comply with the du  | ty to cooperate. <u>P</u><br>al compliance or :  | cal Plan is <u>not legally co</u><br>lease be as precise as p<br>soundness of the Local I  | ossible.  |
| HAM DOLL<br>ESTIMATED<br>HAVE M<br>MORE HO<br>WHICH TO<br>CAPACHTO<br>HOW ARE<br>REFUSE CO<br>EMERCIENO<br>ST. HELEN<br>WHERE | E WAREHOUSING CONSTANT FLO ORÉ CONSESTIO OUSING WOULD THERE IS NO Y AND TSEYOU CULECTION CONC LIES, (FIRE + TEMENT OF C S. POPULATION E ARE ALL | S BECOME A  ALONGSTDE TO  WARRENT  FUNDING:  TO COPE  MESTION: IN THE  AMBULANCE  OMMON CHROL  THE EXTERN  THE EXT | NON MOTE TROFFIC OF SCRIOUS PROTECTION SCRIOUS PROTECTION THIS SHE IS FU THOUGHOUT HAYD MORE SCHOOLS.  PROLICE - FIRE SCRUIC AFFIC COULD COS SCRUICE)  NO TRECLINE SINCE PEOPLE COMING THROUP PEOPLE THROUP T | NOTIONAL THE<br>NOTIONAL THE<br>NOTIONAL THE<br>NOTIONAL THE<br>DOLK.<br>TOES SURCIETYS.<br>RETCHED TO. |

| CIRECNBELTI   | THE PROPOSED REMOVAL FROM THE   |
|---|---|
| TO PREVENT ALL REASO  | NS. AT. (NO 6. THE  |
| ONLY . MODIFICATION.  | IS TO LEAVE CREENBELT   |
| AS. CHRENBELT" AS.  | AND CONSIDER. ALL RESIDER   |
| ALREADY. RECIDING. 1  | N. HAYDOCK.   |
|   | Please continue on a separate sheet if necessary  |
|   |   |
|   | Please continue on a senarate sheet if necessary  |
| formation necessary to support/justify the represell not normally be a subsequent opportunity to no presentation at the publication stage.  | ccinctly all the information, evidence and supporting   |
| formation necessary to support/justify the repressill not normally be a subsequent opportunity to nepresentation at the publication stage.  fter this stage, further submissions will be one and issues he/she identifies for examination.  | ccinctly all the information, evidence and supporting sentation and suggested modification, as there nake further representations based on the original style at the request of the Inspector, based on matters ation; do you consider it necessary to participate at   |
| formation necessary to support/justify the repressil not normally be a subsequent opportunity to necessariation at the publication stage.  Ifter this stage, further submissions will be one and issues he/she identifies for examination.  8. If your representation is seeking a modification or all part of the examination? (the hearing)   | ccinctly all the information, evidence and supporting sentation and suggested modification, as there nake further representations based on the original sty at the request of the Inspector, based on matters ation; do you consider it necessary to participate atings in public)  |
| ill not normally be a subsequent opportunity to ne presentation at the publication stage.  Ifter this stage, further submissions will be on and issues he/she identifies for examination.  8. If your representation is seeking a modification or a part of the examination? (the hearing No, I do not wish to participate  | ccinctly all the information, evidence and supporting sentation and suggested modification, as there nake further representations based on the original sly at the request of the Inspector, based on matters ation; do you consider it necessary to participate at ngs in public)  Yes, I wish to participate at the oral              |
| ifformation necessary to support/justify the representation necessary to support/justify the representation necessary to support a subsequent opportunity to necessary to a subsequent opportunity to necessary the publication stage.  If this stage, further submissions will be on and issues he/she identifies for examination.  8. If your representation is seeking a modification the oral part of the examination? (the hearing No, I do not wish to participate at the oral examination. | ccinctly all the information, evidence and supporting sentation and suggested modification, as there nake further representations based on the original sly at the request of the Inspector, based on matters ation; do you consider it necessary to participate at ngs in public)  Yes, I wish to participate at the oral              |
| Information necessary to support/justify the representation necessary to support/justify the representation at the publication stage.  Infer this stage, further submissions will be on an issues he/she identifies for examination.  8. If your representation is seeking a modification the oral part of the examination? (the hearing the oral part of the examination).  No, I do not wish to participate at the oral examination.  | ccinctly all the information, evidence and supporting sentation and suggested modification, as there nake further representations based on the original sty at the request of the Inspector, based on matters attion; do you consider it necessary to participate at ngs in public)  Yes, I wish to participate at the oral examination |

7. Please set out what modification(s) you consider necessary to make the Local Plan legally

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.



# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

(For official use only)

Please also read the Representation Form Guidance Note that is available with this form, or online at: www.sthelens.gov.uk/localplan

Please ensure the form is returned to us by no later than 5pm on Wednesday 13th March 2019. Any comments received after this deadline cannot be accepted.

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

#### PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

| <ol> <li>Your Details         (we will correspond via your agent)     </li> </ol> | 2. Your Agent's Details (if applicable) |
|---|---|
|   | Title:                                  |
| First Name: CHRISTOPHER   | Title: First name:                      |
| Last Name: NEWTOW   | Last Name:                              |
| Organisation/company:   | Organisation/company:                   |
| Address: 45 ROOKERY LOWE<br>RAINFORD  | Address:                                |
| Postcode: WN II 8EG   | Postcode:                               |
| Tel No  | Tel No:                                 |
| Mobil   | Mobile No:                              |
| Email   | Email:                                  |
| Signature:  | Date: 9.3.19                            |

(namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via email)

☐ No

Please note - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

#### **RETURN DETAILS**

Please return your completed form to us by no later than 5pm on Wednesday 13th March 2019 by:

post to:

Local Plan

St. Helens Council

Town Hall

Victoria Square

St Helens WA10 1HP

or by hand delivery to:

Ground Floor Reception

St. Helens Town Hall

(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

#### **FURTHER INFORMATION**

If you require further information please see the FAQs on our website: www.sthelens.gov.uk/localplan

If you still need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk

Telephone: 01744 676190

#### **NEXT STEPS**

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

#### **DATA PROTECTION**

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: www.sthelens.gov.uk/localplan

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

### **PART B - YOUR REPRESENTATION**

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

| 3. To which                              | part of the Loca                        | al Plan o       | does this re                        | epresent  | ation relate?  | 10         |                                       | 2              |
|--|---|-----------------|-------------------------------------|-----------|--|------------|---------------------------------------|----------------|
| Policy Policy                            | Paragraph/<br>diagram<br>table          | Or Sea Tou      | Policies<br>Map                     | OBTECTION | Sustainability<br>Appraisal/<br>Strategic<br>Environmental<br>Assessment | UVSESSAINA | Habitats<br>Regulations<br>Assessment | FOR MANY HOUSE |
|  | nents (please na<br>nd relevant part/   |                 |                                     |           |  |            |                                       |                |
| 4. Do you co                             | onsider the St Had the Guidance         | lelens B        | sorough Lo                          | ocal Plan | <b>2020-2035 is:</b><br>gal Compliance ar                                | nd the T   | ests of Soundn                        | ess            |
| Legally Com                              | pliant?                                 |                 |                                     | ☐ Yes     | No   | 6          |                                       |                |
| Sound?                                   | 100000000000000000000000000000000000000 |                 |                                     | ☐ Yes     | ✓ No   |            |                                       |                |
|  | th the Duty to Co                       | ooperate        |                                     | Yes       | No   |            |                                       |                |
| Please tick a                            | as appropriate                          |                 |                                     |           |  |            |                                       |                |
| Justified?<br>Effective?<br>Consistent v | vith National Poli                      | cy?             |                                     |           | b NEED TO TO<br>AND WHICH<br>SAVING GREEN<br>TURE GENE                   | U Bei      | IT FOR                                |                |
| or fails to                              | comply with the                         | e legal our com | to coopera<br>compliance<br>nments. | e or sou  | Plan is <u>not legally</u> se be as precise and ness of the Lo           | as poss    | sible.                                | ound           |
| benef<br>Nous<br>Wolid                   | it futur                                | 201             | need the pet                        | for       | a Sound a Sound of Dek   | egul       | places                                | ,              |

| incapable of modification at examination)  | consider necessary to make the Local Plan legally matter you have identified at 6. above where this it any non-compliance with the duty to cooperate is any of the will need to say why this modification will make a lit will be helpful if you are able to put forward your or text. Please be as precise as possible. |
|--|---|
|  |   |
|  | Please continue on a separate sheet if necessary  |
| formation necessary to support/justify the repre<br>Il not normally be a subsequent opportunity to | uccinctly all the information, evidence and supporting esentation and suggested modification, as there make further representations based on the original   |
| d issues he/she identifies for examination.  | only at the request of the Inspector, based on matters  |
| No, I do not wish to participate at the oral examination   | Yes, I wish to participate at the oral examination  |
|  |   |
| If you wish to participate at the oral part of this to be necessary:                               | f the examination, please outline why you consider  |
| o. If you wish to participate at the oral part of this to be necessary:                            | f the examination, please outline why you consider  |
| . If you wish to participate at the oral part o<br>this to be necessary:                           | f the examination, please outline why you consider  |

Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

1800756M



# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

(For official use only)

Please also read the Representation Form Guidance Note that is available with this form, or online at: www.sthelens.gov.uk/localplan

Please ensure the form is returned to us by no later than 5pm on Wednesday 13th March 2019. Any comments received after this deadline cannot be accepted.

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

#### **PART A - YOUR DETAILS**

we will contact you by your postal address.

Please note that you must complete Parts A and B of this form.

| Your Details     (we will correspond via your agent)   | 2. Your Agent's Details (if applicable)  |
|--|--|
| Title: HIS   | Title:   |
| First Name: ANN LEOR   | First name:  |
| Last Name: トレアン・ル  | Last Name:   |
|  | Organisation/company:  |
| Address: 40 blackblook Ro<br>Blackblook St. HIREHS   | Address:   |
|  | Postcode:  |
|  | Tel No:  |
|  | Mobile No:   |
|  | Email:   |
| Signature:   | Date: \2-3-19  |
| Please be aware that anonymous forms cannot be considered you MUST include your details above. | e accepted and that in order for your comments to be   |
|  | ges of the St Helens Borough Local Plan 2020-2035? ublication of the Inspector's recommendations and |
| Yes (via email)  | ☐ No   |
| Please note - email is the Council's preferred met   | thod of communication. If no email address is provided   |

#### **RETURN DETAILS**

Please return your completed form to us by no later than 5pm on Wednesday 13th March 2019 by:

post to:

**Local Plan** 

St.Helens Council

**Town Hall** 

Victoria Square

St Helens

**WA10 1HP** 

or by hand delivery to:

Ground Floor Reception

St. Helens Town Hall

(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

#### **FURTHER INFORMATION**

If you require further information please see the FAQs on our website: www.sthelens.gov.uk/localplan

If you still need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk

Telephone: 01744 676190

#### **NEXT STEPS**

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

#### DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: **www.sthelens.gov.uk/localplan** 

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

# Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

### **PART B - YOUR REPRESENTATION**

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

| 3. To which <sub>I</sub>           | part of the Local Pla                              | ın does this rep                             | resentation relate?   |   |
|------------------------------------|--|--|---|---|
| Policy                             | Paragraph/<br>diagram<br>table                     | Policies<br>Map                              | Sustainability Appraisal/ Strategic Environmental Assessment  | Habitats<br>Regulations<br>Assessment     |
|                                    | nents (please name<br>and relevant part/section    | on)  |   |   |
| <b>4. Do you co</b><br>Please rea  | nsider the St Helens<br>d the Guidance note        | s Borough Loca<br>for explanations           | I <b>Plan 2020-2035 is:</b><br>of Legal Compliance and t  | he Tests of Soundness                     |
| Legally Com                        | oliant?  |  | Yes X No  |   |
| Sound?                             |  |  | Yes 🖄 No  |   |
| Complies wit                       | h the Duty to Coopera                              | ate  | Yes 🔀 No  |   |
| Please tick as                     | s appropriate                                      |  |   |   |
| 5. If you con<br>Please read       | <b>sider the Local Plan</b><br>d the Guidance note | is <u>unsound</u> , is for explanations      | it because it is not:<br>of the Tests of Soundness  |   |
| Positively Pre                     | pared?   | $\boxtimes$                                  |   |   |
| Justified?                         |  | <b>X</b>                                     |   |   |
| Effective?                         |  | abla   |   |   |
| Consistent wi                      | th National Policy?                                | ×  |   |   |
|                                    |  |  |   |   |
| 6. Please giv                      | e details of why you                               | consider the Le                              | ocal Plan is not legally co   | mpliant or is unsound                     |
|                                    |  |  | Please be as precise as p   |   |
| use this bo                        | ox to set out your co                              | mments.                                      | soundness of the Local  | Pian, piease aiso                         |
| flow Furt<br>are under restrict my | ther pressure was<br>great pressure al             | n and furth<br>uld be put cor<br>ready. I am | al 10 the environment of building would in local schools, for a keen rumbler and absormably object to using | pilale etc., which<br>building here would |
|                                    |  |  |   |   |

| e L  | es to soundness (NB please note that pable of modification at examination) ocal Plan legally compliant or sound gested revised wording of any policy  | ). You will<br>I. It will be                 | need to say why this modification will man<br>helpful if you are able to put forward you<br>lease be as precise as possible.                        |
|--|---|--|---|
| ıgg  | gested revised wording of any policy  | OI text. Fi                                  | lease be as precise as possible.  |
|  |   |  |   |
|  |   |  |   |
|  |   |  |   |
|  |   |  |   |
|  |   |  |   |
|  |   |  |   |
|  |   |  | Please continue on a separate sheet if nece   |
| ot n<br>eser<br>• <b>th</b> i  | normally be a subsequent opportunity to<br>ntation at the publication stage.  | o make fur<br>only at th                     | n and suggested modification, as there ther representations based on the original erequest of the Inspector, based on matter                        |
| ot reservited  | normally be a subsequent opportunity to ntation at the publication stage.  is stage, further submissions will be ues he/she identifies for examination  | o make fur  only at th  .  ication; d        | e request of the Inspector, based on matter of the Inspector, based on matter of you consider it necessary to participate                           |
| ot reserting   | normally be a subsequent opportunity to ntation at the publication stage.  is stage, further submissions will be ues he/she identifies for examination to representation is seeking a modifier.   | o make fur  only at th  .  ication; d        | e request of the Inspector, based on matter of the Inspector, based on matter of you consider it necessary to participate                           |
| ot reserves this serves the contract of the co | normally be a subsequent opportunity to ntation at the publication stage.  is stage, further submissions will be ues he/she identifies for examination our representation is seeking a modification oral part of the examination? (the heat the oral examination) | o make fur only at th . ication; d arings in | e request of the Inspector, based on matter or you consider it necessary to participate public)  Yes, I wish to participate at the oral             |
| ot reserves this   | normally be a subsequent opportunity to ntation at the publication stage.  is stage, further submissions will be use he/she identifies for examination our representation is seeking a modifical part of the examination? (the heat the oral examination)         | o make fur only at th . ication; d arings in | e request of the Inspector, based on matter or you consider it necessary to participate public)  Yes, I wish to participate at the oral examination |
| ot reserves this serves the contract of the co | normally be a subsequent opportunity to ntation at the publication stage.  is stage, further submissions will be use he/she identifies for examination our representation is seeking a modifical part of the examination? (the heat the oral examination)         | o make fur only at th . ication; d arings in | e request of the Inspector, based on matter or you consider it necessary to participate public)  Yes, I wish to participate at the oral examination |
| ot reserves this serves the contract of the co | normally be a subsequent opportunity to ntation at the publication stage.  is stage, further submissions will be use he/she identifies for examination our representation is seeking a modifical part of the examination? (the heat the oral examination)         | o make fur only at th . ication; d arings in | e request of the Inspector, based on matter or you consider it necessary to participate public)  Yes, I wish to participate at the oral examination |
| ot reserves the second of the  | normally be a subsequent opportunity to ntation at the publication stage.  is stage, further submissions will be use he/she identifies for examination our representation is seeking a modifical part of the examination? (the heat the oral examination)         | o make fur only at th . ication; d arings in | e request of the Inspector, based on matter or you consider it necessary to participate public)  Yes, I wish to participate at the oral examination |

Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

#### **Representor Details**

| Web Reference Number | WF0228           |
|----------------------|------------------|
| Type of Submission   | Web submission   |
| Full Name            | Mr George Newton |
| Organisation         |                  |
| Address              | 24 Avery Road    |
|                      | Haydock          |
|                      | St Helens        |
|                      | Merseyside       |
|                      | WA11 0XA         |
| Agent Details        |                  |

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

No

3. To which part of the Local Plan does this representation relate?

| 3. To which part of the Local Flan does this representation relate: |               |  |  |  |
|---|---------------|--|--|--|
| Policy  | LPA05-Site2HA |  |  |  |
| Paragraph / diagram / table   |               |  |  |  |
| Policies Map  |               |  |  |  |
| Sustainability Appraisal / Strategic                                |               |  |  |  |
| Environmental Assessment  |               |  |  |  |
| Habitats Regulation Assessment                                      |               |  |  |  |
| Other documents   |               |  |  |  |

#### 4. Do you consider the St Helens Borough Local Plan 2020-2035:

| Is legally compliant?                | No |
|--------------------------------------|----|
| Is sound?                            | No |
| Complies with the duty to cooperate? | No |

#### 5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

### 6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

Increased housing in this area is unsustainable because of the lack of services, school places, doctors, fire, police and council i.e. bin collection and road repairs.

Population has declined since 1981, why is more housing required?.

All brownfield sites must be exhausted first and empty property's brought back into use, as well converting all un-used space over shops before considering greenbelt land for building. Roads throughout Haydock and the surrounding area are narrow and unfit for the large number of vehicles that the new housing proposals will generate, this will present an increased danger to pedestrians and road users alike and lead to an increase in accidents.

#### 7. Please set out modification(s) you consider are necessary

Delete the land from the proposed removal from the greenbelt.

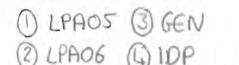
### 8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

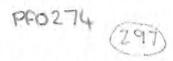
No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

| Response Date | 3/11/2019 9:09:53 AM |
|---------------|----------------------|







Ref: LPSD

0 6 MAR 2019

(For official use only)

# © LPA06 © IDP St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Please also read the Representation Form Guidance Note that is available with this form, or online at: www.sthelens.gov.uk/localplan

Please ensure the form is returned to us by no later than 5pm on Wednesday 13th March 2019. Any comments received after this deadline cannot be accepted.

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

### PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

| Your Details    (we will correspond via your agent)  | 2. Your Agent's Details (if applicable)  |
|--|--|
| Title: Mr.   | Title:   |
|  | First name:  |
|  | Last Name:   |
| Organisation/company:  | Organisation/company:  |
| Address: 40 PINEOLD DRIVE  CCLESTON  | Address:   |
|  | Postcode:  |
|  | Tel No:  |
|  | Mobile No:   |
|  | Email:   |
| Signature:   | Date: 3.3.20(9)  |
| lease be aware that anonymous forms cannot be onsidered you MUST include your details above. | accepted and that in order for your comments to be   |
|  | ges of the St Helens Borough Local Plan 2020-2035? ublication of the Inspector's recommendations and |
| Yes (via email)  | ☐ No   |
| lease note - email is the Council's preferred meth   | nod of communication. If no email address is provided,   |

#### RETURN DETAILS

Please return your completed form to us by no later than 5pm on Wednesday 13th March 2019 by:

post to:

Local Plan

St. Helens Council

Town Hall Victoria Square St Helens

**WA10 1HP** 

or by hand delivery to:

Ground Floor Reception St. Helens Town Hall

(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

#### **FURTHER INFORMATION**

If you require further information please see the FAQs on our website: www.sthelens.gov.uk/localplan

If you still need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk

Telephone: 01744 676190

#### **NEXT STEPS**

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

#### DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: www.sthelens.gov.uk/localplan

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

# PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

| Policy      | Paragraph/                                       | Policies           | Sustainability  | Habitats                  |
|-------------|--|--------------------|---|---------------------------|
| , oney      | diagram<br>table                                 | Мар                | Appraisal/<br>Strategic<br>Environmental<br>Assessment        | Regulations<br>Assessment |
|             | uments (please name<br>and relevant part/section | on)                |   |                           |
|             | consider the St Helensead the Guidance note      |                    | Plan 2020-2035 is:<br>Legal Compliance and th                 | e Tests of Soundness      |
| Legally Cor | mpliant?   |                    | res P No  |                           |
| Sound?      |  |                    | res No  |                           |
| Complies w  | vith the Duty to Cooper                          | ate 🔲 `            | res No  |                           |
| Please tick | as appropriate                                   |                    |   |                           |
|             |  |                    | because it is not:<br>the Tests of Soundness                  |                           |
| Justified?  | repared;   |                    | he Plan is based on   | Hamed medhodology         |
| Effective?  |  | <u> </u>           | The Plan is not de  | liverable                 |
|             | with National Policy?                            |                    | the Plan is not de<br>the does not comple                     | with NPPF 2018            |
|             |  |                    |   | 1-34,000                  |
|             |  |                    | al Plan is <u>not legally cor</u><br>ease be as precise as po |                           |
| If you wis  |  | al compliance or s | oundness of the Local P                                       | TO THE STREET (12 May)    |
| The Pi      | ion does not                                     | : White            |   |                           |
| = the       | requirement of                                   | rivolana 70        | trengoloush slike   | to 1570 surroun'i         |
| . Ine       | cuiteria for                                     | elderwotena        | dransport as 4  | e plan promotes           |
| incre       | and dependen                                     | ey from to         | enoport hubs.   |                           |
| hans .      | round elderior                                   | ng torgets 1       | reposed one basis   | landularidae us propos    |
| empl        | arguent growt                                    | - prediction       | ~   |                           |
| Edla        | due land us                                      | e by conce         | straking on gre   | e space -                 |
| done        | lopment over +                                   | own centre d       | the hangolous   | higher denuties           |
|             |  |                    |   |                           |
| Food        | security by                                      | iduoned agn        | cultural land of  | separate sheet            |

## Supplementary Sheet for Item 6.

- The housing need of 486 pa is aspirational and driven by economic growth forecasts which
  are flawed and over optimistic. The latest estimate by the ONS (2016) predicts that 383
  houses per year will be required to meet housing needs in St Helens and not the older
  forecast of 486 (2014) which the council are using.
- The Plan makes no mention of Brownfield and previously developed land which is not yet available or included in the Brownfield Register. The St Helens council statement of Contaminated Land sites (2015) indicates that 3170 ha of the lowest priority contaminated land exists in St Helens. If these were to be remediated and made available it would completely eliminate the need for the 2 green belt sites of 56.6 ha and 148 ha for housing need.
- The council in conjunction with Liverpool City Region Combined Authority and neighbouring authorities have no policy for bringing unsuitable sites outside the brownfield register back into use. It is not reasonable to assume that sites cannot be made available within the 15 year plan or the 25 year safeguarded period being considered.
- The loss of grade 1 and 2 agricultural land is not mentioned. The negative impact on farming and distribution jobs is not considered. It is not sensible to build on productive farmland, especially since after Brexit more agricultural land may be required for food production.
- The Borough has significant and long-term traffic problems as it is, specifically at Windle Island, Bleak Hill Road, M6/J23 and M6/J21-26. The Infrastructure Delivery Plan refers to current road improvements but does not outline how local and borough wide road improvements are to be made and funded with the introduction of this plan. There is a proliferation of giant warehouses being built between Stonebridge Park, Knowsley and Florida Farm in Haydock. When the Port of Liverpool becomes fully operational with further development at Bickerstaffe and Skelmersdale, this alone will result in an increase in excess of 300 in HGV traffic. It is ludicrous to build 1000 + houses seeking access to the A580. This will create an unacceptable impact on highway safety and the cumulative impacts on the road network will be severe.
- The North West has recently been identified as the most congested area outside of London and St Helens is not meeting its air Quality objectives in several areas in the borough. The increase in traffic proposed will have a significant impact to air quality, noise, tranquillity and general health. The council is promoting less vehicle dependency and yet this plan will exacerbate the situation with edge of town developments.
- If the development of 8HS were to go ahead, there would be insufficient facilities for health care, schools and public transport in the area. The population increase envisaged requires between 10-16 new GPs plus replacements but the IDP does not indicate how they will be provided and funded. The IDP also does not elaborate on how hospitals need to grow to provide a safe service. The schools in the area will be unable to cope. Although Bleak Hill School is being extended to cope with existing demand, it will be unable to cope with the children of 1000 new families. The new medical centre being built at Millfields in Eccleston is built for the existing number of residents in the area and will be inadequate for the vast influx of new residents.

compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible. . The over 8145 should be renoved from the Soul list and reduced to Green Belt dissipation. . The newer estimate of housing need produced by the CHS(2016) should be used intend of the outdated 2014 figure . The Plan should ensue that development does not have an unocceptable impact on highway safety or the searchmal imports in the road naturally which will be severe. The Plan does not do this. the Plan should include provision for herediating brownfield sites so that given bet land is safeguarded from future development

7. Please set out what modification(s) you consider necessary to make the Local Plan legally

Please note: your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

Please continue on a separate sheet if necessary

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

| 8. If yo | 8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public) |  |  |  |  |
|----------|--|--|--|--|--|
|          | No, I do not wish to participate at the oral examination   | Yes, I wish to participate at the oral examination |  |  |  |

| 9. If you wish to participate at the oral part of the examination, please outline why you consider<br>this to be necessary: |  |  |  |  |  |
|---|--|--|--|--|--|
|   |  |  |  |  |  |
|   |  |  |  |  |  |
|   |  |  |  |  |  |
|   |  |  |  |  |  |
|   |  |  |  |  |  |
|   |  |  |  |  |  |

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.



# ①-LPAOS ③-GEN PFO275 ②-LPAO6 ④-IOP St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

(For official use only)

Please also read the Representation Form Guidance Note that is available with this form, or online at: www.sthelens.gov.uk/localplan

Please ensure the form is returned to us by no later than 5pm on Wednesday 13th March 2019. Any comments received after this deadline cannot be accepted.

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

## PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

| 1. Your Details (we will correspond via your agent)                                       | 2. Your Agent's Details (if applicable)  |
|---|--|
| Title: MRS  | Title:   |
| First Name: BRENDA  | First name:  |
|   | Last Name:   |
|   | Organisation/company:  |
| Address: 40 PINFOLD DRIVE   | Address:   |
|   |  |
|   | Postcode:  |
| 100   | Tel No:  |
|   | Mobile No:   |
|   | Email:   |
| Signature:  | Date: 2.3.2019   |
| lease be aware that anonymous forms cannot bonsidered you MUST include your details above | be accepted and that in order for your comments to be  |
|   | ages of the St Helens Borough Local Plan 2020-2035? publication of the Inspector's recommendations and |
| Yes (via email)   | □ No   |
|   | ethod of communication. If no email address is provided,   |

#### RETURN DETAILS

Please return your completed form to us by no later than 5pm on Wednesday 13th March 2019 by:

post to:

Local Plan

St. Helens Council

Town Hall

Victoria Square

St Helens

**WA10 1HP** 

or by hand delivery to:

Ground Floor Reception St. Helens Town Hall

(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

#### FURTHER INFORMATION

If you require further information please see the FAQs on our website: www.sthelens.gov.uk/localplan

If you still need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk

Telephone: 01744 676190

#### **NEXT STEPS**

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

#### DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: www.sthelens.gov.uk/localplan

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

# PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

| Policy        | Paragraph/                                      | Policies          | Sustainability   | Habitats                  |
|---------------|---|-------------------|--|---------------------------|
| , Siloy       | diagram   | Map               | Appraisal/ Strategic Environmental Assessment  | Regulations<br>Assessment |
|               | ments (please name<br>and relevant part/section | on)               |  |                           |
|               | onsider the St Helen<br>ad the Guidance note    |                   | Plan 2020-2035 is:<br>f Legal Compliance and th  | ne Tests of Soundness     |
| Legally Con   | npliant?  |                   | Yes PNo  |                           |
| Sound?        |   |                   | Yes No   |                           |
| Complies w    | ith the Duty to Cooper                          | ate 🔲             | Yes No   |                           |
| Please tick a | as appropriate                                  |                   |  |                           |
|               | nsider the Local Plan<br>ad the Guidance note   |                   | because it is not:<br>f the Tests of Soundness   |                           |
| Positively Pr | epared?   |                   |  |                           |
| Justified?    |   |                   | The plan is bone .<br>The plan is not delive it does not comply  | d on Howed                |
| Effective?    |   |                   | The plan is not deli   | verable                   |
| Consistent v  | vith National Policy?                           |                   | at goes not comply   | MIT MADE 5018             |
| or fails to   | comply with the dut                             | y to cooperate. P | cal Plan is <u>not legally cor</u><br>lease be as precise as po<br>soundness of the Local F  | ossible.                  |
| The Plan      | does not soli                                   | ક્રોપ :           |  |                           |
|               | requirement for                                 |                   | development  |                           |
|               |   |                   | usport as the plan   | promotes                  |
| incre         | oned car depend                                 | levery toom 4     | ranapolt hubs.   |                           |
| · sust        | ainable housin                                  | a torgets p       | baned one baned  | on aspirosional           |
| emple         | ndust deany                                     | predictions.      | and an archard   |                           |
|               |   |                   | traking on great   |                           |
|               |   |                   | devisioned with he priculated to both the southern of the sout |                           |
|               |   |                   |  | reporte sheet             |

## Supplementary Sheet for Item 6.

- The housing need of 486 pa is aspirational and driven by economic growth forecasts which
  are flawed and over optimistic. The latest estimate by the ONS (2016) predicts that 383
  houses per year will be required to meet housing needs in St Helens and not the older
  forecast of 486 (2014)which the council are using.
- The Plan makes no mention of Brownfield and previously developed land which is not yet available or included in the Brownfield Register. The St Helens council statement of Contaminated Land sites (2015) indicates that 3170 ha of the lowest priority contaminated land exists in St Helens. If these were to be remediated and made available it would completely eliminate the need for the 2 green belt sites of 56.6 ha and 148 ha for housing need.
- The council in conjunction with Liverpool City Region Combined Authority and neighbouring
  authorities have no policy for bringing unsuitable sites outside the brownfield register back
  into use. It is not reasonable to assume that sites cannot be made available within the 15
  year plan or the 25 year safeguarded period being considered.
- The loss of grade 1 and 2 agricultural land is not mentioned. The negative impact on farming and distribution jobs is not considered. It is not sensible to build on productive farmland, especially since after Brexit more agricultural land may be required for food production.

3

2

- The Borough has significant and long-term traffic problems as it is, specifically at Windle Island, Bleak Hill Road, M6/J23 and M6/J21-26. The Infrastructure Delivery Plan refers to current road improvements but does not outline how local and borough wide road improvements are to be made and funded with the introduction of this plan. There is a proliferation of giant warehouses being built between Stonebridge Park, Knowsley and Florida Farm in Haydock. When the Port of Liverpool becomes fully operational with further development at Bickerstaffe and Skelmersdale, this alone will result in an increase in excess of 300 in HGV traffic. It is ludicrous to build 1000 + houses seeking access to the A580. This will create an unacceptable impact on highway safety and the cumulative impacts on the road network will be severe.
- The North West has recently been identified as the most congested area outside of London and St Helens is not meeting its air Quality objectives in several areas in the borough. The increase in traffic proposed will have a significant impact to air quality, noise, tranquillity and general health. The council is promoting less vehicle dependency and yet this plan will exacerbate the situation with edge of town developments.
- If the development of 8HS were to go ahead, there would be insufficient facilities for health care, schools and public transport in the area. The population increase envisaged requires between 10-16 new GPs plus replacements but the IDP does not indicate how they will be provided and funded. The IDP also does not elaborate on how hospitals need to grow to provide a safe service. The schools in the area will be unable to cope. Although Bleak Hill School is being extended to cope with existing demand, it will be unable to cope with the children of 1000 new families. The new medical centre being built at Millfields in Eccleston is built for the existing number of residents in the area and will be inadequate for the vast influx of new residents.

- 7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.
- . The ones, 8H5 should be renoved from the safeguarded hist and returned to Green Belt land.
- The newer estimate of housing need produced by the ONS(2016) should be used instead of the subdated 2014 figure.

  The Plan should ensure that development does not have an unacceptable impact on highway safety or the residual impacts on the road network which will be severe. The Plan does not the road network which will be severe.
- does not do this . The Plan should include provision for remediating brownfield suites on that green belt land its sufeguerated from future development.

  Please continue on a separate sheet if necess Please continue on a separate sheet if necessary

Please note: your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

| our representation is seeking a modificatoral part of the examination? (the hearing | tion; do you consider it necessary to participate at ngs in public) |
|---|---|
| No, I do not wish to participate at the oral examination                            | Yes, I wish to participate at the oral examination                  |

| 9. If you wish to participate at the oral part of the examination, please outline why you consider<br>this to be necessary: |  |  |  |  |
|---|--|--|--|--|
|   |  |  |  |  |
|   |  |  |  |  |
|   |  |  |  |  |
|   |  |  |  |  |

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.



# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

(For official use only)

Please also read the Representation Form Guidance Note that is available with this form, or online at: www.sthelens.gov.uk/localplan

Please ensure the form is returned to us by no later than 5pm on Wednesday 13th March 2019. Any comments received after this deadline cannot be accepted.

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

### PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

| 131 | 13 MAY | 2019 | 11 | 29 |
|-----|--------|------|----|----|
|-----|--------|------|----|----|

| Your Details     (we will correspond via your agent)  | 2. Your Agent's Details (if applicable)   |
|---|---|
| Title:  | Title:  |
|   | First name:   |
| Last Name: Nocton   | Last Name:  |
|   | Organisation/company:   |
| Address: 508 Clour  | Address:  |
|   | Postcode:   |
|   | Tel No:   |
| Mobile No:  | Mobile No:  |
| Email:  | Email:  |
| Signature:  | Date: <u>\</u>  |
| Please be aware that anonymous forms cannot considered you MUST include your details about                                | be accepted and that in order for your comments to be ve.   |
| Would you like to be kept updated of future sometime (namely submission of the Plan for examination adoption of the Plan) | stages of the St Helens Borough Local Plan 2020-2035? I, publication of the Inspector's recommendations and |
| Yes (via email)   | □ No  |
| Please note - email is the Council's preferred n  | method of communication. If no email address is provided,   |

#### **RETURN DETAILS**

Please return your completed form to us by no later than 5pm on Wednesday 13th March 2019 by:

post to:

Local Plan

St. Helens Council

**Town Hall** 

Victoria Square

St Helens WA10 1HP

or by hand delivery to:

Ground Floor Reception St. Helens Town Hall

(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

#### **FURTHER INFORMATION**

If you require further information please see the FAQs on our website: www.sthelens.gov.uk/localplan

If you still need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk

Telephone: 01744 676190

#### **NEXT STEPS**

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

#### **DATA PROTECTION**

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: www.sthelens.gov.uk/localplan

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.



### St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at <a href="https://www.sthelens.gov.uk/localplan">www.sthelens.gov.uk/localplan</a>.

Please ensure the form is returned to us by no later than <u>5pm on Monday 13<sup>th</sup> May 2019</u>. Any comments received after this deadline <u>cannot</u> be accepted.

This form has two parts;

Part A - Personal Details

Part B – Your Representation(s).

## PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

| 1. Your Details  | 2. Your Agent's Details (if applicable) (we will correspond via your agent) |
|--|---|
| Title: MR  | Title:  |
| First Name: GARETH   | First name:   |
| Last Name: NOLAN   | Last Name:  |
| Organisation/company:  | Organisation/company:   |
| Address: 17 NEWBOLD COURT<br>ST HELENS<br>MERSEYSIDE<br>Postcode: NA9 LITE | Address:  Postcode:   |
| Tel No:  | Tel No:   |
| Mobile No:   | Mobile No:  |
| Email:   | Email:  |
| Signature:   | Date: 27 APR 2019   |

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you MUST include your details above.

|  | ted of future stages of the St Helens Borough Local ssion of the Plan for examination, publication of the I adoption of the Plan) |
|--|---|
| Yes (Via Email)  | No 🗌  |
| Please note - e-mail is the Counc address is provided, we will conta | il's preferred method of communication. If no e-mail ct you by your postal address.   |



# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

1 3 MAY 2019

(For official use only)

Please also read the Representation Form Guidance Note that is available with this form, or online at www.sthelens.gov.uk/localplan.

Please ensure the form is returned to us by no later than 5pm on Monday 13th May 2019. Any comments received after this deadline cannot be accepted.

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s).

## PART A - YOUR DETAILS

| 1. Your Details            | Your Agent's Details (if applicable) (we will correspond via your agent) |
|----------------------------|--|
| Title: VV                  | Title:   |
| First Name: Shoulh         | First name:  |
| Last Name: Name:           | Last Name:   |
| Organisation/company:      | Organisation/company:  |
| Address: 442 Garshood Road | Address:   |
| Postcode: WN4 OXJ          | Postcode:  |
| Tel N                      | Tel No:  |
| Mobil                      | Mobile No:   |
| Emai                       | Email:   |

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you MUST include your details above.

| Would you like to be kept update Plan 2020-2035? (namely submissinspector's recommendations and | ted of future stages of the St Helens Borough Local sion of the Plan for examination, publication of the adoption of the Plan) |
|---|--|
| Yes [/] (Via Email)   | No 🗆   |

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

## RETURN DETAILS

Please return your completed form to us by no later than 5pm on Manager 137 # 2019 by:

post to:

**Local Plan** 

St. Helens Council

Town Hall Victoria Square St. Helens Merseyside WA10 1HP

or by hand delivery to:

Ground Floor Reception, St. Helens Town Hall (open Monday-

Friday 8:30am - 5:15pm)

or by e-mail to:

planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

#### **FURTHER INFORMATION**

If you require further information please see the FAQs on our website at <a href="https://www.sthelens.gov.uk/localplan">www.sthelens.gov.uk/localplan</a>. If you still need assistance, you can contact us via:

Email:

planningpolicy@sthelens.gov.uk

Telephone:

01744 676190

#### **NEXT STEPS**

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

## **DATA PROTECTION**

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website at <a href="https://www.sthelens.gov.uk/localplan">www.sthelens.gov.uk/localplan</a>.

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete <u>PART B</u> of this form, setting out your representation/comment.

# Please use a separate copy of Part B for each separate comment/representation.

### PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

| 3. To which part of the Loca Policy Paragraph                        | Policies                                | Sustainability                                | Habitats                 |
|--|---|---|--------------------------|
| PAS 5 / diagram / table  | Map<br>IHA                              | Appraisal/ Strategic Environmental Assessment | Regulation<br>Assessment |
| Other documents (please na<br>document and relevant<br>part/section) | ime                                     |   |                          |
| 4. Do you consider the St Ho<br>Please read the Guidance note        | for explanations of L                   | egal Compliance and the                       | Tests of Soundness       |
| Legally Compliant?   | Yes 🖾                                   | No C  |                          |
| Sound?   | Yes 🗆                                   | No 🗷  |                          |
| Complies with the Duty to<br>Cooperate                               | Yes 🗆                                   | No □  |                          |
| Please tick as appropriate   |   |   |                          |
| 5. If you consider the Local Please read the Guidance note           |   |   |                          |
| Positively Prepared?   |   |   |                          |
| Justified?   | <b>X</b>                                |   |                          |
| Effective?   | 图                                       |   |                          |
| Consistent with National Pol   |   |   |                          |
|  | you consider the Luty to cooperate. Ple | ase be as precise as po                       | ssible.                  |
| box to set out your commen   |   | at ranki od best ce                           | es anoso servici dal di  |
| Not justified-the council sho<br>population of St Helens has         |   |   |                          |

recycling of of derelict and other land. Using Green Belt does not do this. Release of Green Belt

will cause significant harm to the purposes of the Green Belt. Houses in this area is not sustainable due to the lack of school places, there will need to be a school built on the new estate as the school run on the existing estate is very chaotic, with cars parked around the school causing an obstruction to all road users, this is due to local people living on the estate taking their children to school. Doctor's surgeries, bus routes, parking at the train station is



limited and people from the estate, who use the train are parking in Strange Road, School Lane, Station Road and Victoria Road, leaving their cars all day while they use the train. This causes obstruction for buses and other traffic. The use of cars is being encouraged due to lack of facilities. The access to the site on either Garswood Road/ By LCINGE Road is not adequate due to narrow road and lack of pavements. Also, the amount of traffic already using these roads is increasing. There are a lot of walkers and it is getting really bad crossing these roads due to the increased amount of traffic. Any necessary highways work must be funded by the developer and not the council tax payer. There is no statement of common ground. In addition there were coal pits in Garswood in the past, there were four pits. One on the land off Billinge Road, from Simms Lane up to Billinge, one on Arch Lane, two on Garswood Road/Winstanley Road and an open cast on Garswood Road/Winstanley Road. There are mines under the nearly all the fields in Garswood. This will need to be factored in to the cost of building the estate. N.B. The number of children with asthma is increasing due to pollution and there are a significant number of children in Garswood with asthma. A child has died due to pollution and that is one child too many.

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible. Due to pollution and extra traffic coming from the new development would it not be better to spread the houses creating villages instead of estates, there is plenty of land? Also, there is two plots of land in Billinge Road where houses have been pulled down, where two more could be built. There is also two on Leyland Green Road. There is a plot on Leyland where a large house was pulled down, there is room for four houses there. Look for other plots as we need the Green Belt for farming. There is a wide road from Billinge to the East Lancs at Carr Mill, Birchley Road/Carr Mill Road. In addition, there is a railway station in Orrell with a bus service from St Helens to Wigan through Orrell every fifteen minutes. Would it help if you use incentives for builders to use brown land, eg free planning permission? In addition enable people who are homeless would it better

to build social housing? This government stated that they would combat homelessness. Instead they are enabling developers to become rich.

# Please use a separate copy of Part B for each separate comment/representation.

### PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

|  | agraph<br>gram  | Policies<br>Map   | 145                                 | Sustainability Appraisal/ Strategic Environmental Assessment                           | Habitats Regulation Assessment  |
|--|---|---|-------------------------------------|--|---|
| Other documents (pidocument and relevant part/section)   |   |   |                                     |  |   |
| 4. Do you consider t   | he St Hele  | ns Borough L  | ocal Pla                            | an 2020-2035 is<br>I Compliance and  | the Tests of Soundness  |
| Legally Compliant?   |   | Yes 🛛   |                                     | N  | оΓ  |
| Sound?   |   | Yes 🗆   |                                     |  | οK  |
| Complies with the D Cooperate  | uty to  | Yes 🗆   |                                     | N  | ٥٢  |
| Positively Prepared Justified?   | ?   |   |                                     |  |   |
|  | •   | N N   |                                     |  |   |
| Consistent with Nat  | ional Polic   |   |                                     | A: 1:  |   |
| or fails to comply w   | ith the duty<br>ort the lega  | to cooperate  | . Pleas                             | e be as precise  | ally compliant or is unsound<br>as possible.<br>cal Plan, please also use th  |
| Not justified-the corpopulation of St He One of the purpose recycling of of dere will cause significant sustainable due to | uncil should<br>lens has do<br>s of the Go<br>lict and oth<br>nt harm to<br>the lack of | d be put to streelined since<br>reen Belt is to<br>ner land. Usin<br>the purposes<br>school place | 1981. Very assist of the Cos, there | Where are all the in urban regener Belt does not de Green Belt. Hous will need to be a | on estimates, as the extra people coming from ration by encouraging the lo this. Release of Green Bees in this area is not a school built on the new cars parked around the |

school causing an obstruction to all road users, this is due to local people living on the estate taking their children to school. Doctor's surgeries, bus routes, parking at the train station is limited and people from the estate, who use the train are parking in Strange Road, School Lane, Station Road and Victoria Road, leaving their cars all day while they use the train. This causes obstruction for buses and other traffic. The use of cars is being encouraged due to lack of facilities. The access to the site on either Billinge Road/Leyland Green Road is not adequate due to narrow road and lack of pavements. Also, the amount of traffic already using these roads is increasing. There are a lot of walkers and it is getting really bad crossing these roads due to the increased amount of traffic. . Any necessary highways work must be funded by the developer and not the council tax payer. There is no statement of common ground. In addition there were coal pits in Garswood in the past, there were four pits. One on the land off Billinge Road, from Simms Lane up to Billinge, one on Arch Lane, two on Garswood Road/Winstanley Road and an open cast on Garswood Road/Winstanley Road. There are mines under the nearly all the fields in Garswood. This will need to be factored in to the cost of building the estate. N.B. The number of children with asthma is increasing due to pollution and there are a significant number of children in Garswood with asthma. A child has died due to pollution and that is one child too many.



Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Due to pollution and extra traffic coming from the new development would it not be better to spread the houses creating villages instead of estates, there is plenty of land? Also, there is two plots of land in Billinge Road where houses have been pulled down, where two more could be built. There is also two on Leyland Green Road. There is a plot on Leyland where a large house was pulled down, there is room for four houses there. Look for other plots as we need the Green Belt for farming. There is a wide road from Billinge to the East Lancs at Carr Mill, Birchley Road/Carr Mill Road. In addition, there is a railway station in Orrell with a bus service from St Helens to Wigan through Orrell every fifteen minutes. Would it help if you use incentives for builders to use brown land, eg free planning permission?

| lease note your representation should cover supporting information necessary to support / just odification, as there will not normally be a substitutions based on the original representations that the control of the stage, further submissions will be on matters and issues he/she identifies for expressions will be on matters and issues he/she identifies for expressions. | tify the representation and suggested equent opportunity to make further tion at the publication stage. |
|---|---|
| If your representation is seeking a modification  | t; do you consider it necessary to participate  |
| or part of the examination? (the nearings in  | public)   |
| 1 40, 1 40 HOL WISH to participate at the   |   |
| No, I do not wish to participate at the oral examination  If you wish to participate at the oral part of the s to be necessary:   | Yes, I wish to participate at the oral examination  examination, please outline why you consid          |
| oral examination  If you wish to participate at the oral part of the  | examination   |
| oral examination  If you wish to participate at the oral part of the is to be necessary:  | examination   |

**NSPCC** 

# 1 8 MAR 2019

14,3.19.

To whom it may concern,

I am writing to state my objections to Your proposed building plan in Rainford. & have been unable to obtain your official form.

Mainly & object because grade 1 farmland is precious. The government have stated that by 2050 we need to be producing 60% more food! How will this be possible it we build on this type of Formland. Once it has been built on it is lost to famers.

Other concerns are also important but & feel secondary to my main concern.

Increased pollution --- already a problem Presure on Roads -- the byposs is already a major problem.

hack of schoolplaces: increased driving. Difficulty getting medical appointments \_ - there is already a 3-4 week wait for appointments.

I would be grateful if my concerns be considered with the many others you will have had. Yours faithfully

C.A. NOLAN (MRS)

Mrs C Nolan

**NSPCC** 



### St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

(For official use only)

Please also read the Representation Form Guidance Note that is available with this form, or online at www.sthelens.gov.uk/localplan.

Please ensure the form is returned to us by no later than 5pm on Monday 13th May 2019. Any comments received after this deadline cannot be accepted.

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s).

### **PART A - YOUR DETAILS**

| Title:                | Title                 |
|-----------------------|-----------------------|
|                       | Title:                |
| First Name: Janice    | First name:           |
| Last Name: Sanice     | Last Name:            |
| Organisation/company: | Organisation/company: |
| Address: Torscals     | Address:              |
| Postcode: WA9 4QD     | Postcode:             |
| Гel No:               | Tel No:               |
| Mobile No:            | Mobile No:            |
| Email:                | Email:                |
| Signature: [          | Date:                 |

|  | ed of future stages of the St Helens Borough Local<br>sion of the Plan for examination, publication of the<br>adoption of the Plan) |
|--|---|
| Yes (Via Email)  | No 🗌  |
| Please note - e-mail is the Council address is provided, we will contact | 's preferred method of communication. If no e-mail<br>et you by your postal address.  |

### **RETURN DETAILS**

Please return your completed form to us by no later than 5pm on Monday 13th May 2019 by:

post to:

Local Plan

St. Helens Council

**Town Hall** 

Victoria Square

St.Helens Merseyside WA10 1HP

or by hand delivery to:

Ground Floor Reception, St. Helens Town Hall (open Monday-

Friday 8:30am - 5:15pm)

or by e-mail to:

planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

#### **FURTHER INFORMATION**

If you require further information please see the FAQs on our website at <a href="https://www.sthelens.gov.uk/localplan">www.sthelens.gov.uk/localplan</a>. If you still need assistance, you can contact us via:

Email:

planningpolicy@sthelens.gov.uk

Telephone:

01744 676190

#### **NEXT STEPS**

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

#### DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website at www.sthelens.gov.uk/localplan.

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete <u>PART B</u> of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

# PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

| 3. To which  | part of the Local P               | lan does this repr    | esentation relate?   |                                      |
|--|-----------------------------------|-----------------------|--|--------------------------------------|
| Policy   | Paragraph<br>/ diagram<br>/ table | Policies<br>Map       | Sustainability Appraisal/ Strategic Environmental Assessment | Habitats<br>Regulation<br>Assessment |
| document ar part/section)  |                                   | e                     |  |                                      |
| Please read to   | he Guidance note fo               | or explanations of L  | Plan 2020-2035 is:   | Tests of Soundness                   |
| Legally Com  | pliant?                           | Yes 🗆                 | No 🗆   |                                      |
| Sound?   | Un the Destricts                  | Yes □<br>Yes □        | No □   |                                      |
| The second secon | th the Duty to                    | Yes 🗆                 | INO LI   |                                      |
| Cooperate Please tick as a   | appropriate                       |                       |  |                                      |
| . IOGOO HON GO   | - PPI OPI IGLO                    |                       |  |                                      |
|  |                                   |                       | t because it is not:<br>ne Tests of Soundness                |                                      |
| Positively Pr  |                                   | r explanations of the | ie resis di soundness  |                                      |
| Justified?   | epareu :                          |                       |  |                                      |
| Effective?   |                                   | F                     |  |                                      |
|  | ith National Policy               |                       |  |                                      |
|  |                                   |                       |  |                                      |
| 6. Please giv  | e details of why y                | ou consider the L     | ocal Plan is not legally c                                   | ompliant or is unsound               |
|  |                                   |                       | ase be as precise as po                                      |                                      |
|  |                                   |                       |  |                                      |
|  |                                   | compliance or so      | oundness of the Local Pl                                     | an, please also use this             |
| box to set ou  | it your comments                  |                       |  |                                      |
|  |                                   |                       |  |                                      |
|  |                                   |                       |  |                                      |
|  |                                   |                       |  |                                      |
|  |                                   |                       |  |                                      |
|  |                                   |                       |  |                                      |
|  |                                   |                       |  |                                      |
|  |                                   |                       |  |                                      |
|  |                                   |                       |  |                                      |
|  |                                   |                       |  |                                      |
|  |                                   |                       |  |                                      |
|  |                                   |                       |  |                                      |
|  |                                   |                       |  |                                      |
|  |                                   |                       |  |                                      |
|  |                                   |                       |  |                                      |
|  |                                   |                       | Please continue on a   | a separate sheet if necessary        |

| apable of modification at examination). You  | non-compliance with the duty to cooperate is will need to say why this modification will make   |
|--|---|
| e Local Plan legally compliant or sound. It will<br>agested revised wording of any policy or text  | I be helpful if you are able to put forward your  |
| ggested revised wording or any policy or text  | i. I leade be de predice de pescible.   |
|  |   |
|  |   |
|  |   |
|  |   |
|  |   |
|  |   |
|  |   |
|  |   |
|  |   |
|  |   |
|  | Please continue on a separate sheet if necess   |
| ease note your representation should cover   |   |
| oporting information necessary to support / ju   |   |
| diffication on there will not normally be a qui  |   |
|  | bsequent opportunity to make further  |
| presentations based on the original represen   | tation at the publication stage.  |
| presentations based on the original represen<br>ter this stage, further submissions will be  | tation at the publication stage.  e only at the request of the Inspector, based   |
| presentations based on the original represen   | tation at the publication stage.  e only at the request of the Inspector, based   |
| presentations based on the original representer this stage, further submissions will be matters and issues he/she identifies for   | tation at the publication stage.  e only at the request of the Inspector, based   |
| presentations based on the original representer this stage, further submissions will be matters and issues he/she identifies for our representation is seeking a modification or all part of the examination? (the hearings)   | etation at the publication stage.  e only at the request of the Inspector, based examination.  on; do you consider it necessary to participate in public)                                       |
| presentations based on the original representer this stage, further submissions will be matters and issues he/she identifies for a life your representation is seeking a modification or all part of the examination? (the hearings No, I do not wish to participate at the  | e only at the publication stage. e only at the request of the Inspector, based examination.  on; do you consider it necessary to participate in public)  Yes, I wish to participate at the oral |
| presentations based on the original representer this stage, further submissions will be matters and issues he/she identifies for all your representation is seeking a modification or all part of the examination? (the hearings)  | etation at the publication stage.  e only at the request of the Inspector, based examination.  on; do you consider it necessary to participate in public)                                       |
| presentations based on the original representer this stage, further submissions will be matters and issues he/she identifies for a life your representation is seeking a modification or all part of the examination? (the hearings No, I do not wish to participate at the  | e only at the publication stage. e only at the request of the Inspector, based examination.  on; do you consider it necessary to participate in public)  Yes, I wish to participate at the oral |
| oresentations based on the original representer this stage, further submissions will be matters and issues he/she identifies for a life your representation is seeking a modification or all part of the examination? (the hearings No, I do not wish to participate at the oral examination   | e only at the publication stage. e only at the request of the Inspector, based examination.  on; do you consider it necessary to participate in public)  Yes, I wish to participate at the oral |
| ter this stage, further submissions will be matters and issues he/she identifies for a lift your representation is seeking a modification or all part of the examination? (the hearings No, I do not wish to participate at the oral examination)  | e only at the request of the Inspector, based examination.  on; do you consider it necessary to participate in public)  Yes, I wish to participate at the oral examination                      |
| resentations based on the original representer this stage, further submissions will be matters and issues he/she identifies for all fyour representation is seeking a modification or all part of the examination? (the hearings No, I do not wish to participate at the oral examination  | e only at the request of the Inspector, based examination.  on; do you consider it necessary to participate in public)  Yes, I wish to participate at the oral examination                      |
| resentations based on the original representer this stage, further submissions will be matters and issues he/she identifies for all formatters and issues he/she identifies fo | e only at the request of the Inspector, based examination.  on; do you consider it necessary to participate in public)  Yes, I wish to participate at the oral examination                      |
| resentations based on the original representer this stage, further submissions will be matters and issues he/she identifies for a figure of the examination? (the hearings No, I do not wish to participate at the oral examination)   | e only at the request of the Inspector, based examination.  on; do you consider it necessary to participate in public)  Yes, I wish to participate at the oral examination                      |
| resentations based on the original representer this stage, further submissions will be matters and issues he/she identifies for all formatters and issues he/she identifies fo | e only at the request of the Inspector, based examination.  on; do you consider it necessary to participate in public)  Yes, I wish to participate at the oral examination                      |
| resentations based on the original representer this stage, further submissions will be matters and issues he/she identifies for all formatters and issues he/she identifies fo | e only at the request of the Inspector, based examination.  on; do you consider it necessary to participate in public)  Yes, I wish to participate at the oral examination                      |
| resentations based on the original representer this stage, further submissions will be matters and issues he/she identifies for all fyour representation is seeking a modification or all part of the examination? (the hearings No, I do not wish to participate at the oral examination  | e only at the request of the Inspector, based examination.  on; do you consider it necessary to participate in public)  Yes, I wish to participate at the oral examination                      |
| ter this stage, further submissions will be matters and issues he/she identifies for a lift your representation is seeking a modification or all part of the examination? (the hearings No, I do not wish to participate at the oral examination)  | e only at the request of the Inspector, based examination.  on; do you consider it necessary to participate in public)  Yes, I wish to participate at the oral examination                      |
| oresentations based on the original representer this stage, further submissions will be matters and issues he/she identifies for a life your representation is seeking a modification or all part of the examination? (the hearings No, I do not wish to participate at the oral examination   | e only at the request of the Inspector, based examination.  on; do you consider it necessary to participate in public)  Yes, I wish to participate at the oral examination                      |
| oresentations based on the original representer this stage, further submissions will be matters and issues he/she identifies for a life your representation is seeking a modification or all part of the examination? (the hearings No, I do not wish to participate at the oral examination   | e only at the request of the Inspector, based examination.  on; do you consider it necessary to participate in public)  Yes, I wish to participate at the oral examination                      |
| oresentations based on the original representer this stage, further submissions will be matters and issues he/she identifies for a life your representation is seeking a modification or all part of the examination? (the hearings No, I do not wish to participate at the oral examination   | e only at the request of the Inspector, based examination.  on; do you consider it necessary to participate in public)  Yes, I wish to participate at the oral examination                      |
| oresentations based on the original representer this stage, further submissions will be matters and issues he/she identifies for a life your representation is seeking a modification or all part of the examination? (the hearings No, I do not wish to participate at the oral examination   | e only at the request of the Inspector, based examination.  on; do you consider it necessary to participate in public)  Yes, I wish to participate at the oral examination                      |



# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

(For official use only)

Please also read the Representation Form Guidance Note that is available with this form, or online at: www.sthelens.gov.uk/localplan

Please ensure the form is returned to us by no later than 5pm on Wednesday 13th March 2019. Any comments received after this deadline cannot be accepted.

This form has two parts;

Yes (via email)

we will contact you by your postal address.

Part A - Personal Details

Part B - Your Representation(s)

2 Verre Amentic Details /if applicable

# PART A - YOUR DETAILS Please note that you must complete Parts A and B of this form.

| l | (we will correspond via your agent)   | 2. Your Agent's Details (II applicable)   |
|---|---|---|
|   | 11/1/   | _ Title:  |
|   | First Name: Stephen   | Title:  |
|   | Last Name: NONTH  | Last Name:  |
|   | Organisation/company:   | Organisation/company/   |
|   |   |   |
|   |   | Address:  |
|   |   |   |
|   |   |   |
|   |   | Postcode:   |
|   |   | Tel No:   |
|   |   | Email:  |
|   |   | Erran.  |
|   |   |   |
|   |   |   |
|   | Signature:  | Date: 10/3/18.  |
|   | Signature.  | ······  |
|   | Please be aware that anonymous forms cannot be a considered you MUST include your details above.                            | accepted and that in order for your comments to be  |
|   | Would you like to be kept updated of future stage (namely submission of the Plan for examination, pub adoption of the Plan) | es of the St Helens Borough Local Plan 2020-2035?<br>blication of the Inspector's recommendations and |

No

Please note - email is the Council's preferred method of communication. If no email address is provided,

#### **RETURN DETAILS**

Please return your completed form to us by no later than 5pm on Wednesday 13th March 2019 by:

post to: Local Plan

St. Helens Council

Town Hall

Victoria Square

St Helens WA10 1HP

or by hand delivery to: Ground Floor Reception

St. Helens Town Hall

(open Monday-Friday 8.30am - 5.15pm)

or by email to: planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

#### **FURTHER INFORMATION**

If you require further information please see the FAQs on our website: www.sthelens.gov.uk/localplan

If you still need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk

Telephone: 01744 676190

#### **NEXT STEPS**

The Council intends to submit the St. Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

#### DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: www.sthelens.gov.uk/localplan

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

# Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

# **PART B - YOUR REPRESENTATION**

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

| N 10.5   |   | an does this repre   | sentation relate?   |  |
|--|---|--|---|--|
| Policy   | Paragraph/<br>diagram<br>table  | Policies<br>Map  | Sustainability Appraisal/ Strategic Environmental Assessment                              | Habitats<br>Regulations<br>Assessment                            |
|  | nents (please name<br>nd relevant part/secti  | on)  |   |  |
|  | onsider the St Helen<br>ad the Guidance note  |  | Plan 2020-2035 is:<br>Legal Compliance and the  | ne Tests of Soundness  |
| Legally Com  | pliant?   |  | Yes No  |  |
| Sound?   |   |  | Yes No  |  |
| Complies wit   | th the Duty to Cooper   | rate   | Yes No  |  |
| Please tick as   | s appropriate   |  |   |  |
|  | sider the Local Plar<br>d the Guidance note   |  | because it is not:<br>the Tests of Soundness  |  |
| Positively Pre   | epared?   |  |   |  |
| Justified?   |   | \(\overline{A}\)   | No The Plan is basedon  | r Housed methodology   |
| Effective?   |   | $\boxtimes$  | Jo The Plan is not del  | weake  |
|  | ith National Policy?  | Du   | No The Plan is basedon<br>So The Plan is not del<br>So It does not comp                   | 1 4 w1000 2016   |
| Consistent wi  |   |  |   | 7 - 1 - 1  |
|  | e details of why you  |  | ool Dion is not leadly and  | millions on the law of the law                                   |
| 6. Please giv<br>or fails to   | comply with the dut   | u consider the Loc<br>ty to cooperate. <u>Pl</u><br>al compliance or s   | cal Plan is <u>not legally cor</u><br>ease be as precise as po<br>oundness of the Local F | ossible.   |
| 6. Please give or fails to on fails to on fails to on the fails between the fails of the fails o | comply with the dut to support the legal ox to set out your co  | a consider the Local ty to cooperate. Plant compliance or somments.  | ease be as precise as poor oundness of the Local F  | derelighent and  |
| 6. Please give or fails to of fails to of the second carge are carge from from from from from from from from   | comply with the dute to support the legal ox to set out your construction of full the dependency as established larger for over town as | to consider the Local to cooperate. PI al compliance or somments.  The Motor vehicles of persect en proceed en outre deretainer. | ease be as precise as poor oundness of the Local F  | derelighent and  sound date and  Sound date and  He plan torgets |

| the l                             | pliant or sound, having regard to the<br>les to soundness (NB please note the<br>pable of modification at examination | e matter yo<br>iat any non<br>n). You will<br>id. It will be | ecessary to make the Local Plan legally bu have identified at 6. above where this compliance with the duty to cooperate is need to say why this modification will make helpful if you are able to put forward your lease be as precise as possible. |
|-----------------------------------|---|--|---|
| Joung 9 gr                        | gest that Brun daws   | Le colon torapts   | Haland were resulte weeten pla<br>an already basy congested port  |
| blevel                            | prent to a more sulable, &  | astand   | to loroten to an ored More per  |
| Person                            | Inh where radical eler  | Stolen   | ward not emport so much up  |
| Please                            | note: your representation should cove   | r succinctly   | Please continue on a separate sheet if necessary all the information, evidence and supporting and suggested modification, as there  |
| will not r<br>represe<br>After th | normally be a subsequent opportunity<br>ntation at the publication stage.   | to make fur<br>e only at th                                  | ther representations based on the original e request of the Inspector, based on matters   |
| 8. If yo                          |   | ification; d   | o you consider it necessary to participate at public)   |
|                                   | No, I do not wish to participate at the oral examination  | X  | Yes, I wish to participate at the oral examination  |
|                                   |   |  |   |
|                                   | ou wish to participate at the oral par<br>to be necessary:  | rt of the exa  | amination, please outline why you consider  |
|                                   |   | rt of the exa  | amination, please outline why you consider  |
|                                   |   | rt of the ex   | amination, please outline why you consider  |
|                                   |   | rt of the exa  | amination, please outline why you consider  |

Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

## RO1317



# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

(For official use only)

Please also read the Representation Form Guidance Note that is available with this form, or online at: www.sthelens.gov.uk/localplan

Please ensure the form is returned to us by no later than 5pm on Wednesday 13th March 2019. Any comments received after this deadline cannot be accepted.

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

### PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

| Your Details     (we will correspond via your agent) | 2. Your Agent's Details (if applicable) |
|--|---|
| Title: MR  | Title:                                  |
| First Name: AAN                                      | First name:                             |
| Last Name: NUTTAL                                    | Last Name:                              |
| Organisation/company: RETILED                        | Organisation/company:                   |
| 0  | Address:                                |
| ST. HELENS.  |   |
| Postcode: WA9 407                                    | Postcode:                               |
|  | Tel No:                                 |
|  | Mobile No:                              |
|  | Email:                                  |
|  |   |
|  |   |
| Signature:   | Date: 21.3.19                           |

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you MUST include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

| Yes       | (via | email) |
|-----------|------|--------|
| <br>1 100 | VICA | OHIOU) |

No.

Please note - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

### **RETURN DETAILS**

Please return your completed form to us by no later than 5pm on Wednesday 13th March 2019 by:

post to:

**Local Plan** 

St. Helens Council

Town Hall

Victoria Square

St Helens WA10 1HP

or by hand delivery to:

Ground Floor Reception St. Helens Town Hall

(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

### **FURTHER INFORMATION**

If you require further information please see the FAQs on our website: www.sthelens.gov.uk/localplan

If you still need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk

Telephone: 01744 676190

### **NEXT STEPS**

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

### **DATA PROTECTION**

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: **www.sthelens.gov.uk/localplan** 

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

## RO1318

## 1- GEN 2-LPA06



Representation Local plan 2020-2035 Sonia Oakes to: planningpolicy

01/03/2019 14:29

Submitted by: mrs sonia oakes at 11 Padstow drive windle St. Helens wal0 . I am against the removal of the green belt particularly if the land between the A580, crantock grove, ecclesfield and houghtons lane (now 8HS) and now reclassified as "safeguarded" for development. I consider that the St. Helens borough local plan 2020-2035 isneither justified, effective or consistent with national policy. It is based on flawed methodology as it is based on aspirational employment growth predictions and a housing need using an older forecast (2014) ; it does not comply with NPPF 2018; it makes no mention of brownfield and previously developed land that is not yet available or included in the brownfield register. It is not making use of the existence of brownfield land that already exists and that would satisfy the housing planned by the removal of green belt . The plan is not sound as it doesn't satisfy the requirement for sustainable development and it promotes car dependency . It is not effective because it concentrates on green space development over town centre development with higher densities . Also there are major water pipelines that cut across the 8HS sites that cannot be built on . It would cause further gridlock in the area and delay ambulance services . 2018 paragraph 109 states that development should be prevented if there would be an unacceptable impact on highway safety or the residual cumulative impact on the road network will be severe . Pedestrian crossing in the area of windle island is exceedingly difficult and has caused previous fatalities . It is also extremely difficult to turn into St. Helens from bleak hill particularly with other cars attempting to cross in the opposite direction from the petrol station . At the same time reduced bus service in this out of town area require elderly residents and others who do not drive to take taxis - even to get to local health centres and hospitals . The plan does not satisfy food security - particularly at a time when we are planning to leave the EU - by ignoring the country's agricultural needs and building on the agricultural grade 1&2 of 8HS. Oncethe green belt is lost it is lost for ever and the northwest which is the most congested area outside of London will continue to sprawl and become increasingly polluted creating increasing health and mental problems. The plan would further force people to drive out of the urban sprawl thus again increasing dependence on ownership of cars when the presence of green belt land encourages exercise and promotes well being . On the other hand we would hope that existing brownfield sites would be restored and be used in an attempt towards revitalising depressed areas .

Sent from my iPhone

## RO1319

Sinc 8HS

)-GENERAL

12/03/2019 16:23



Local plan John Oakes to: planningpolicy

From: To:

Mr John oakes. 11 Padstow Drive Windle St Helens Merseyside Wal0 6EL tel: wish to submit my representation against the St. Helens Tocal plan particularly for the removal of the green belt and specifically for the land known as 8HS between the A580, Crantock grove, Ecclesfield Rd and houghtons lane . I consider the plan not to be sound because it is not justified, effective or consistent with national policy ( NPPF 2018 )- The O 2 latter because it promotes unsustainable traffic growth causing exacerbated traffic issues the plan's targets are based on older forecasts for example of housing needs (2014), and aspirational employment predictions if ignores the need for grade 1 and 2 agricultural land in a future Brexit and the increasing demand for local produce ; it is not justified as there is sufficient brownfield sites within the borough that would satisfy the needs for housing in areas that are better served by public transport and there should be s policy by the LRCA and the council to bring 'unsuitable ' sites outside the brownfield register back to use . It is not effective as it concentrates on green space development over town centre development with higher densities . We have already seen how out of centre retail developments has been the death of St. Helens town centres and again how this promotes car dependency . The plan is not in line with sustainable how this promotes car dependency. The promotes development or the revitalisation of brownfield sites 1

Sent from my iPhone

## RO1320



# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

(For official use only)

Please also read the Representation Form Guidance Note that is available with this form, or online at: www.sthelens.gov.uk/localplan

Please ensure the form is returned to us by no later than 5pm on Wednesday 13th March 2019. Any comments received after this deadline cannot be accepted.

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

13 MAY 2019

### **PART A - YOUR DETAILS**

Please note that you must complete Parts A and B of this form.

| 1. Your Details   | 2. Your Agent's Details (if applicable)  |
|---|--|
| (we will correspond via your agent)   | Title  |
| Title: / KS   | Title:   |
|   | First name:  |
| Last Name: OATES  | Last Name:   |
|   | Organisation/company:  |
| Address: 563 CLOCK FACE RD  | Address:   |
| MERSEYSIDE  | Postcode:  |
|   |  |
| Tel No:   | Tel No:  |
| Mobile No:  | Mobile No:   |
| Email:  | Email:   |
| Signature:  | Date: 23/03/19   |
| considered you MUST include your details above.   | accepted and that in order for your comments to be   |
| Would you like to be kept updated of future stage (namely submission of the Plan for examination, put adoption of the Plan) | ges of the St Helens Borough Local Plan 2020-2035? ublication of the Inspector's recommendations and |
| Yes (via email)   | No   |
| Please note - email is the Council's preferred met we will contact you by your postal address.                              | hod of communication. If no email address is provided,   |

### **RETURN DETAILS**

Please return your completed form to us by no later than 5pm on Wednesday 13th March 2019 by:

post to:

Local Plan

St. Helens Council

Town Hall

Victoria Square

St Helens WA10 1HP

or by hand delivery to:

Ground Floor Reception St.Helens Town Hall

(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

### **FURTHER INFORMATION**

If you require further information please see the FAQs on our website: www.sthelens.gov.uk/localplan

If you still need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk

Telephone: 01744 676190

### **NEXT STEPS**

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

### DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: www.sthelens.gov.uk/localplan

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

## RO1321

| Web Reference Number | WF0402             |
|----------------------|--------------------|
| Type of Submission   | Web submission     |
| Full Name            | Miss Keira O'Brien |
| Organisation         |                    |
| Address              | 8 Langholm Road    |
|                      | Garswood           |
|                      | Wigan WN4 0SE      |
| Agent Details        |                    |

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

### 3. To which part of the Local Plan does this representation relate?

| or to trinon part of the food. Han does this representation related |   |  |
|---|---|--|
| Policy  | Development of warehousing on the land  |  |
|   | between Haydock Lane and Liverpool Road |  |
|   | Policy LPA04 Sites 2EA 5EA 6EA          |  |
| Paragraph / diagram / table   |   |  |
| Policies Map  |   |  |
| Sustainability Appraisal / Strategic                                |   |  |
| Environmental Assessment  |   |  |
| Habitats Regulation Assessment                                      |   |  |
| Other documents   |   |  |

#### 4. Do you consider the St Helens Borough Local Plan 2020-2035:

| Is legally compliant?                | Yes |
|--------------------------------------|-----|
| Is sound?                            | No  |
| Complies with the duty to cooperate? | No  |

### 5. If you consider the Local Plan is unsound, it because it is not:

Justified, Effective, Consistent with national policy

### 6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

The council should be put to strict proof of the need for this type of development, in this position and on this scale

One of the purposes of the greenbelt is to assist in urban regeneration by encouraging the recycling of derelict and other urban land

Using greenbelt fails to encourage this.

The release of greenbelt will cause significant harm to the purposes of greenbelt

The council has already granted planning permission in the greenbelt in respect of site 2EA - Florida farm North

The risk of flooding further down the Clipsley Brook will be exacerbated by future developments at this location

High Volumes of predicated traffic will add to the already over capacity on the highways in the vicinity

There is no statement of common ground with neighbouring authorities

### 7. Please set out modification(s) you consider are necessary

Delete this land from the proposed removal from the greenbelt

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

| Response Date | 2/28/2019 4:27:23 PM |
|---------------|----------------------|

| Web Reference Number | WF0404             |
|----------------------|--------------------|
| Type of Submission   | Web submission     |
| Full Name            | Miss Keira O'Brien |
| Organisation         |                    |
| Address              | 8 Langholm Road    |
|                      | Garswood           |
|                      | Wigan              |
|                      | WN4 0SE            |
| Agent Details        |                    |

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

### 3. To which part of the Local Plan does this representation relate?

| Policy                               | Safeguarded land to the north of Billinge Road |
|--------------------------------------|--|
|                                      | Policy LPA08 Site 1HS                          |
| Paragraph / diagram / table          |  |
| Policies Map                         |  |
| Sustainability Appraisal / Strategic |  |
| Environmental Assessment             |  |
| Habitats Regulation Assessment       |  |
| Other documents                      |  |

#### 4. Do you consider the St Helens Borough Local Plan 2020-2035:

| Is legally compliant?                | Yes |
|--------------------------------------|-----|
| Is sound?                            | No  |
| Complies with the duty to cooperate? | No  |

### 5. If you consider the Local Plan is unsound, it because it is not:

Justified, Effective, Consistent with national policy

### 6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

The council should be put to strict proof of its population estimates. The population of St Helens has been in decline since 1981. Where are all the extra people coming from?

One of the purposes of the greenbelt is to assist in urban regeneration by encouraging the reuse of derelict and other urban land. Using greenbelt fails to encourage fails to encourage this.

The release of greenbelt will cause significant harm to the purposes of the greenbelt.

Housing in this area isn't sustainable because of the lack of school places, doctors surgeries, bus routes and other services. The use of cars is being encouraged because of the lack of facilities. There is no statement of common ground with neighbouring authorities.

### 7. Please set out modification(s) you consider are necessary

Delete this land from the proposed removal from the greenbelt

### 8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

| Response Date | 2/28/2019 4:24:45 PM |
|---------------|----------------------|

| Web Reference Number | WF0405             |
|----------------------|--------------------|
| Type of Submission   | Web submission     |
| Full Name            | Miss Keira O'Brien |
| Organisation         |                    |
| Address              | 8 Langholm Road    |
|                      | Garswood           |
|                      | Wigan WN4 0SE      |
| Agent Details        |                    |

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

### 3. To which part of the Local Plan does this representation relate?

| Policy                               | Development of Housing To the South of Billinge |
|--------------------------------------|---|
|                                      | Road and West of Smock Lane Policy LPA05 Site   |
|                                      | 1HA   |
| Paragraph / diagram / table          |   |
| Policies Map                         |   |
| Sustainability Appraisal / Strategic |   |
| Environmental Assessment             |   |
| Habitats Regulation Assessment       |   |
| Other documents                      |   |

#### 4. Do you consider the St Helens Borough Local Plan 2020-2035:

| Is legally compliant?                | Yes |
|--------------------------------------|-----|
| Is sound?                            | No  |
| Complies with the duty to cooperate? | No  |

### 5. If you consider the Local Plan is unsound, it because it is not:

Justified, Effective, Consistent with national policy

### 6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

The council should be put to strict proof of its population estimates. The population of St Helens has been in decline since 1981. Where are all the extra people coming from?

One of the purposes of the greenbelt is to assist in urban regeneration by encouraging the reuse of derelict and other urban land. Using greenbelt fails to encourage fails to encourage this.

The release of greenbelt will cause significant harm to the purposes of the greenbelt.

Housing in this area isn't sustainable because of the lack of school places, doctors surgeries, bus routes and other services. The use of cars is being encouraged because of the lack of facilities. The access to the site on either Billinge Road or Garswood Road would be inadequate. Any necessary highway works must be funded by the developer and NOT council tax payers

There is no statement of common ground with neighbouring authorities.

### 7. Please set out modification(s) you consider are necessary

Delete this land from the proposed removal from the greenbelt

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

| Response Date | 2/28/2019 4:22:11 PM |
|---------------|----------------------|

| Web Reference Number | WF0406             |
|----------------------|--------------------|
| Type of Submission   | Web submission     |
| Full Name            | Miss Keira O'Brien |
| Organisation         |                    |
| Address              | 8 Langholm Road    |
|                      | Garswood           |
|                      | Wigan              |
|                      | WN4 0SE            |
| Agent Details        |                    |

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

### 3. To which part of the Local Plan does this representation relate?

| or to triner part of the zodar rain account to contain relater |  |
|--|--|
| Development of Housing Florida Farm South                      |  |
| Policy LPA05 Site 2HA  |  |
|  |  |
|  |  |
|  |  |
|  |  |
|  |  |
|  |  |
|  |  |

#### 4. Do you consider the St Helens Borough Local Plan 2020-2035:

| Is legally compliant?                | Yes |
|--------------------------------------|-----|
| Is sound?                            | No  |
| Complies with the duty to cooperate? | No  |

### 5. If you consider the Local Plan is unsound, it because it is not:

Justified, Effective, Consistent with national policy

### 6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

- The council should be put to strict proof of its population estimates. The population of St Helens has been in decline since 1981. Where are all the extra people coming from?

One of the purposes of the greenbelt is to assist in urban regeneration by encouraging the reuse of derelict and other urban land. Using greenbelt fails to encourage fails to encourage this.

The release of greenbelt will cause significant harm to the purposes of the greenbelt.

Housing in this area isn't sustainable because of the lack of school places, doctors surgeries, bus routes and other services. The use of cars is being encouraged because of the lack of facilities. The access to this site is inadequate, a left in/ left out from the East Lancs Road isn't safe and the proposal for a junction at Liverpool Road and Vicarage Road would put additional traffic on an already overstretched highways system. There would be problems of rat running. There are existing flooding problems at this site any remedies to prevent this would place even greater amounts of water into the Clipsley brook.

There is no statement of common ground with neighbouring authorities.

### 7. Please set out modification(s) you consider are necessary

Delete this land from the proposed removal from the greenbelt

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

| Response Date | 2/28/2019 4:20:20 PM |
|---------------|----------------------|

## RO1322

| Web Reference Number | WF0407          |
|----------------------|-----------------|
| Type of Submission   | Web submission  |
| Full Name            | Mr Euan O'Brien |
| Organisation         |                 |
| Address              | 8 Langholm Road |
|                      | Garswood        |
|                      | Wigan WN4 0SE   |
| Agent Details        |                 |

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

### 3. To which part of the Local Plan does this representation relate?

| Policy                               | Development of warehousing on the land  |
|--------------------------------------|---|
|                                      | between Haydock Lane and Liverpool Road |
|                                      | Policy LPA04 Sites 2EA 5EA 6EA          |
| Paragraph / diagram / table          |   |
| Policies Map                         |   |
| Sustainability Appraisal / Strategic |   |
| Environmental Assessment             |   |
| Habitats Regulation Assessment       |   |
| Other documents                      |   |

#### 4. Do you consider the St Helens Borough Local Plan 2020-2035:

| Is legally compliant?                | Yes |
|--------------------------------------|-----|
| Is sound?                            | No  |
| Complies with the duty to cooperate? | No  |

### 5. If you consider the Local Plan is unsound, it because it is not:

Justified, Effective, Consistent with national policy

### 6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

The council should be put to strict proof of the need for this type of development, in this position and on this scale

One of the purposes of the greenbelt is to assist in urban regeneration by encouraging the recycling of derelict and other urban land

Using greenbelt fails to encourage this.

The release of greenbelt will cause significant harm to the purposes of greenbelt

The council has already granted planning permission in the greenbelt in respect of site 2EA - Florida farm North

The risk of flooding further down the Clipsley Brook will be exacerbated by future developments at this location

High Volumes of predicated traffic will add to the already over capacity on the highways in the vicinity

There is no statement of common ground with neighbouring authorities

### 7. Please set out modification(s) you consider are necessary

Delete this land from the proposed removal from the greenbelt

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

| Response Date | 2/28/2019 4:16:57 PM |
|---------------|----------------------|

| Web Reference Number | WF0408          |
|----------------------|-----------------|
| Type of Submission   | Web submission  |
| Full Name            | Mr Euan O'Brien |
| Organisation         |                 |
| Address              | 8 Langholm Road |
|                      | Garswood        |
|                      | Wigan WN4 0SE   |
| Agent Details        |                 |

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

### 3. To which part of the Local Plan does this representation relate?

| Policy                               | Safeguarded land to the north of Billinge Road |
|--------------------------------------|--|
|                                      | Policy LPA08 Site 1HS                          |
| Paragraph / diagram / table          |  |
| Policies Map                         |  |
| Sustainability Appraisal / Strategic |  |
| Environmental Assessment             |  |
| Habitats Regulation Assessment       |  |
| Other documents                      |  |

#### 4. Do you consider the St Helens Borough Local Plan 2020-2035:

| Is legally compliant?                | Yes |
|--------------------------------------|-----|
| Is sound?                            | No  |
| Complies with the duty to cooperate? | No  |

#### 5. If you consider the Local Plan is unsound, it because it is not:

Justified, Effective, Consistent with national policy

### 6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

The council should be put to strict proof of its population estimates. The population of St Helens has been in decline since 1981. Where are all the extra people coming from?

One of the purposes of the greenbelt is to assist in urban regeneration by encouraging the reuse of derelict and other urban land. Using greenbelt fails to encourage fails to encourage this.

The release of greenbelt will cause significant harm to the purposes of the greenbelt.

Housing in this area isn't sustainable because of the lack of school places, doctors surgeries, bus routes and other services. The use of cars is being encouraged because of the lack of facilities.

There is no statement of common ground with neighbouring authorities.

### 7. Please set out modification(s) you consider are necessary

Delete this land from the proposed removal from the greenbelt

### 8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

| Response Date | 2/28/2019 4:14:00 PM |
|---------------|----------------------|

| Web Reference Number | WF0409          |
|----------------------|-----------------|
| Type of Submission   | Web submission  |
| Full Name            | Mr Euan O'Brien |
| Organisation         |                 |
| Address              | 8 Langholm Road |
|                      | Garswood        |
|                      | Wigan WN4 0SE   |
| Agent Details        |                 |

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

### 3. To which part of the Local Plan does this representation relate?

| Policy                               | Development of Housing To the South of Billinge Road and West of Smock Lane Policy LPA05 Site |
|--------------------------------------|---|
|                                      | 1HA   |
| Paragraph / diagram / table          |   |
| Policies Map                         |   |
| Sustainability Appraisal / Strategic |   |
| Environmental Assessment             |   |
| Habitats Regulation Assessment       |   |
| Other documents                      |   |

#### 4. Do you consider the St Helens Borough Local Plan 2020-2035:

| Is legally compliant?                | Yes |
|--------------------------------------|-----|
| Is sound?                            | No  |
| Complies with the duty to cooperate? | No  |

### 5. If you consider the Local Plan is unsound, it because it is not:

Justified, Effective, Consistent with national policy

### 6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

The council should be put to strict proof of its population estimates. The population of St Helens has been in decline since 1981. Where are all the extra people coming from?

One of the purposes of the greenbelt is to assist in urban regeneration by encouraging the reuse of derelict and other urban land. Using greenbelt fails to encourage fails to encourage this.

The release of greenbelt will cause significant harm to the purposes of the greenbelt.

Housing in this area isn't sustainable because of the lack of school places, doctors surgeries, bus routes and other services. The use of cars is being encouraged because of the lack of facilities. The access to the site on either Billinge Road or Garswood Road would be inadequate. Any necessary highway works must be funded by the developer and NOT council tax payers There is no statement of common ground with neighbouring authorities.

### 7. Please set out modification(s) you consider are necessary

Delete this land from the proposed removal from the greenbelt

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

| Response Date | 2/28/2019 4:11:21 PM |
|---------------|----------------------|

| Web Reference Number | WF0410          |
|----------------------|-----------------|
| Type of Submission   | Web submission  |
| Full Name            | Mr Euan O'Brien |
| Organisation         |                 |
| Address              | 8 Langholm Road |
|                      | Garswood        |
|                      | Wigan           |
|                      | WN4 0SE         |
| Agent Details        |                 |

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

### 3. To which part of the Local Plan does this representation relate?

| or to trinen part of the zood rian does this representation relate. |   |
|---|---|
| Policy  | Development of Housing Florida Farm South |
|   | Policy LPA05 Site 2HA                     |
| Paragraph / diagram / table   |   |
| Policies Map  |   |
| Sustainability Appraisal / Strategic                                |   |
| Environmental Assessment  |   |
| Habitats Regulation Assessment                                      |   |
| Other documents   |   |

#### 4. Do you consider the St Helens Borough Local Plan 2020-2035:

| Is legally compliant?                | Yes |
|--------------------------------------|-----|
| Is sound?                            | No  |
| Complies with the duty to cooperate? | No  |

### 5. If you consider the Local Plan is unsound, it because it is not:

Justified, Effective, Consistent with national policy

### 6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

- The council should be put to strict proof of its population estimates. The population of St Helens has been in decline since 1981. Where are all the extra people coming from?

One of the purposes of the greenbelt is to assist in urban regeneration by encouraging the reuse of derelict and other urban land. Using greenbelt fails to encourage fails to encourage this.

The release of greenbelt will cause significant harm to the purposes of the greenbelt.

Housing in this area isn't sustainable because of the lack of school places, doctors surgeries, bus routes and other services. The use of cars is being encouraged because of the lack of facilities. The access to this site is inadequate, a left in/ left out from the East Lancs Road isn't safe and the proposal for a junction at Liverpool Road and Vicarage Road would put additional traffic on an already overstretched highways system. There would be problems of rat running. There are existing flooding problems at this site any remedies to prevent this would place even greater amounts of water into the Clipsley brook.

There is no statement of common ground with neighbouring authorities.

### 7. Please set out modification(s) you consider are necessary

Delete this land from the proposed removal from the greenbelt

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

| Response Date | 2/28/2019 4:09:04 PM |
|---------------|----------------------|

## RO1323

| Web Reference Number | WF0411            |
|----------------------|-------------------|
| Type of Submission   | Web submission    |
| Full Name            | Mrs Julie O'Brien |
| Organisation         |                   |
| Address              | 8 Langholm Road   |
|                      | Garswood          |
|                      | Wigan             |
|                      | WN4 0SE           |
| Agent Details        |                   |

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

### 3. To which part of the Local Plan does this representation relate?

| Policy                               | Development of warehousing on the land  |
|--------------------------------------|---|
|                                      | between Haydock Lane and Liverpool Road |
|                                      | Policy LPA04 Sites 2EA 5EA 6EA          |
| Paragraph / diagram / table          |   |
| Policies Map                         |   |
| Sustainability Appraisal / Strategic |   |
| Environmental Assessment             |   |
| Habitats Regulation Assessment       |   |
| Other documents                      |   |

### 4. Do you consider the St Helens Borough Local Plan 2020-2035:

| Is legally compliant?                | Yes |
|--------------------------------------|-----|
| Is sound?                            | No  |
| Complies with the duty to cooperate? | No  |

### 5. If you consider the Local Plan is unsound, it because it is not:

Justified, Effective, Consistent with national policy

### 6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

Not Justified

The council should be put to strict proof of the need for this type of development, in this position and on this scale

One of the purposes of the greenbelt is to assist in urban regeneration by encouraging the recycling of derelict and other urban land

Using greenbelt fails to encourage this.

The release of greenbelt will cause significant harm to the purposes of greenbelt

The council has already granted planning permission in the greenbelt in respect of site 2EA - Florida farm North

The risk of flooding further down the Clipsley Brook will be exacerbated by future developments at this location

High Volumes of predicated traffic will add to the already over capacity on the highways in the vicinity

I d

There is no statement of common ground with neighbouring authorities

### 7. Please set out modification(s) you consider are necessary

Delete this land from the proposed removal from the greenbelt

### 8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

| Response Date | 2/28/2019 3:52:16 PM |
|---------------|----------------------|
| l '           | , , ,                |

| Web Reference Number | WF0412            |
|----------------------|-------------------|
| Type of Submission   | Web submission    |
| Full Name            | Mrs Julie O'Brien |
| Organisation         |                   |
| Address              | 8 Langholm Road   |
|                      | Garswood          |
|                      | Wigan WN4 0SE     |
| Agent Details        |                   |

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

### 3. To which part of the Local Plan does this representation relate?

| Policy                               | Development of Housing on the land at Florida |
|--------------------------------------|---|
|                                      | Farm South Policy LPA05 - Site 2HA            |
| Paragraph / diagram / table          |   |
| Policies Map                         |   |
| Sustainability Appraisal / Strategic |   |
| Environmental Assessment             |   |
| Habitats Regulation Assessment       |   |
| Other documents                      |   |

### 4. Do you consider the St Helens Borough Local Plan 2020-2035:

| Is legally compliant?                | Yes |
|--------------------------------------|-----|
| Is sound?                            | No  |
| Complies with the duty to cooperate? | No  |

#### 5. If you consider the Local Plan is unsound, it because it is not:

Justified, Effective, Consistent with national policy

### 6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

Not Justified - The council should be put to strict proof of its population estimates. The population of St Helens has been in decline since 1981. Where are all the extra people coming from? One of the purposes of the greenbelt is to assist in urban regeneration by encouraging the reuse of derelict and other urban land. Using greenbelt fails to encourage fails to encourage this. The release of greenbelt will cause significant harm to the purposes of the greenbelt. Housing in this area isn't sustainable because of the lack of school places, doctors surgeries, bus routes and other services. The use of cars is being encouraged because of the lack of facilities. The access to this site is inadequate, a left in/ left out from the East Lancs Road isn't safe and the proposal for a junction at Liverpool Road and Vicarage Road would put additional traffic on an already overstretched highways system. There would be problems of rat running. There are existing flooding problems at this site any remedies to prevent this would place even greater amounts of water into the Clipsley brook.

There is no statement of common ground with neighbouring authorities.

### 7. Please set out modification(s) you consider are necessary

Delete this land from the proposed removal from the greenbelt

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

| Response Date | 2/28/2019 3:33:34 PM |
|---------------|----------------------|

| Web Reference Number | WF0413            |
|----------------------|-------------------|
| Type of Submission   | Web submission    |
| Full Name            | Mrs Julie O'Brien |
| Organisation         |                   |
| Address              | 8 Langholm Road   |
|                      | Garswood          |
|                      | Wigan             |
|                      | WN4 0SE           |
| Agent Details        |                   |

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

### 3. To which part of the Local Plan does this representation relate?

| or to trinion part of the Local Ham does the | is representation relate.   |
|--|---|
| Policy                                       | Development of Housing on the land to the south of Billinge Road and West of Smock Lane Policy LPA05 Site 1HA |
| Paragraph / diagram / table                  |   |
| Policies Map                                 |   |
| Sustainability Appraisal / Strategic         |   |
| Environmental Assessment                     |   |
| Habitats Regulation Assessment               |   |
| Other documents                              |   |

### 4. Do you consider the St Helens Borough Local Plan 2020-2035:

| Is legally compliant?                | Yes |
|--------------------------------------|-----|
| Is sound?                            | No  |
| Complies with the duty to cooperate? | No  |

### 5. If you consider the Local Plan is unsound, it because it is not:

Justified, Effective, Consistent with national policy

### 6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

Justified - The council should be put to strict proof of its population estimates. The population of St Helens has been in decline since 1981. Where are all the extra people coming from? One of the purposes of the greenbelt is to assist in urban regeneration by encouraging the reuse of derelict and other urban land. Using greenbelt fails to encourage fails to encourage this. The release of greenbelt will cause significant. harm to the purposes of the greenbelt. Housing in this area isn't sustainable because of the lack of school places, doctors surgeries, bus routes and other services. The use of cars is being encouraged because of the lack of facilities. The access to the site on either Billinge Road or Garswood Road would be inadequate. Any necessary highway works must be funded by the developer and NOT council tax payers

There is no statement of common ground with neighbouring authorities.

### 7. Please set out modification(s) you consider are necessary

Delete this land from the proposed removal from the greenbelt

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

| Response Date | 2/28/2019 3:22:51 PM |
|---------------|----------------------|

#### **Representor Details**

| Web Reference Number | WF0414            |
|----------------------|-------------------|
| Type of Submission   | Web submission    |
| Full Name            | Mrs Julie O'Brien |
| Organisation         |                   |
| Address              | 8 Langholm Road   |
|                      | Garswood          |
|                      | Wigan             |
|                      | Lancs             |
|                      | WN4 0SE           |
| Agent Details        |                   |

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

#### 3. To which part of the Local Plan does this representation relate?

| or to which part of the Local Flan does this representation relate. |  |
|---|--|
| Safeguadrded land to the north of Billinge Road                     |  |
| Policy LPA06 Site 1HS   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |

#### 4. Do you consider the St Helens Borough Local Plan 2020-2035:

| Is legally compliant?                | Yes |
|--------------------------------------|-----|
| Is sound?                            | No  |
| Complies with the duty to cooperate? | No  |

#### 5. If you consider the Local Plan is unsound, it because it is not:

Justified, Effective, Consistent with national policy

## 6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

Justified - The council should be put to strict proof of its population estimates. The population of St Helens has been in decline since 1981. Where are all the extra people coming from? One of the purposes of the greenbelt is to assist in urban regeneration by encouraging the reuse of derelict and other urban land. Using greenbelt fails to encourage fails to encourage this. The release of greenbelt will cause significant. harm to the purposes of the greenbelt. Housing in this area isn't sustainable because of the lack of school places, doctors surgeries, bus routes and other services. The use of cars is being encouraged because of the lack of facilities. There is no statement of common ground with neighbouring authorities.

#### 7. Please set out modification(s) you consider are necessary

Delete this land from the proposed removal from the greenbelt

### 8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

| Response Date | 2/28/2019 3:14:42 PM |
|---------------|----------------------|

## 1)-LPA04 2)-Statement of Common Ground

Representor Details

| Web Reference Number | WF0363   |
|----------------------|--|
| Type of Submission   | Web submission   |
| Full Name            | Mr Paul O'Brien  |
| Organisation         | THE PART OF THE PA |
| Address              | 8 Langholm Road<br>Garswood<br>Wigan WN4 OSE   |
| Agent Details        |  |

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

| Policy   | Development of warehousing on the land<br>between Haydock Lane and Liverpool Road<br>Policy LPA04 Sites 2EA 5EA 6EA |
|--|---|
| Paragraph / diagram / table  |   |
| Policies Map   |   |
| Sustainability Appraisal / Strategic<br>Environmental Assessment   |   |
| Habitats Regulation Assessment   |   |
| Other documents  |   |
| The state of the s |   |

4. Do you consider the St Helens Borough Local Plan 2020-2035:

| Is legally compliant?                | Yes |  |
|--------------------------------------|-----|--|
| Is sound?                            | No  |  |
| Complies with the duty to cooperate? | No  |  |

#### 5. If you consider the Local Plan is unsound, it because it is not:

Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

The council should be put to strict proof of the need for this type of development, in this position and on this scale

One of the purposes of the greenbelt is to assist in urban regeneration by encouraging the recycling of derelict and other urban land

Using greenbelt fails to encourage this.

The release of greenbelt will cause significant harm to the purposes of greenbelt

The council has already granted planning permission in the greenbelt in respect of site 2EA - Florida farm North

The risk of flooding further down the Clipsley Brook will be exacerbated by future developments at this location

High Volumes of predicated traffic will add to the already over capacity on the highways in the vicinity

There is no statement of common ground with neighbouring authorities

0



- 7. Please set out modification(s) you consider are necessary Delete this land from the proposed removal from the greenbelt
- 8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

| Response Date   | 3/4/2019 3:55:50 PM |
|-----------------|---------------------|
| Tiesporise sure |                     |

### O-LPAOS @-Statement of Common Ground

Representor Details

| Web Reference Number | WF0364                                       |  |
|----------------------|--|--|
| Type of Submission   | Web submission                               |  |
| Full Name            | Mr Paul O'Brien                              |  |
| Organisation         |  |  |
| Address              | 8 Langholm Road<br>Garswood<br>Wigan WN4 0SE |  |
| Agent Details        | English and the second second                |  |

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

| Development of Housing Florida Farm South Policy LPA05 |
|--|
| The last to advise the                                 |
|  |
|  |
|  |
|  |
|  |

4. Do you consider the St Helens Borough Local Plan 2020-2035:

| Is legally compliant?                | Yes |
|--------------------------------------|-----|
| Is sound?                            | No  |
| Complies with the duty to cooperate? | No  |

#### 5. If you consider the Local Plan is unsound, it because it is not:

Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

The council should be put to strict proof of its population estimates. The population of St Helens has been in decline since 1981. Where are all the extra people coming from?

One of the purposes of the greenbelt is to assist in urban regeneration by encouraging the reuse of

derelict and other urban land. Using greenbelt fails to encourage fails to encourage this. The release of greenbelt will cause significant harm to the purposes of the greenbelt.

Housing in this area isn't sustainable because of the lack of school places, doctors surgeries, bus

routes and other services. The use of cars is being encouraged because of the lack of facilities. There is no statement of common ground with neighbouring authorities.

The access to this site is inadequate, a left in/ left out from the East Lancs Road isn't safe and the proposal for a junction at Liverpool Road and Vicarage Road would put additional traffic on an already overstretched highways system. There would be problems of rat running. There are existing flooding problems at this site any remedies to prevent this would place even greater amounts of water into the Clipsley brook.

7. Please set out modification(s) you consider are necessary

Delete this land from the proposed removal from the greenbelt

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

| Response Date | 3/4/2019 3:54:08 PM |
|---------------|---------------------|

## O-LPAOS Q-Statement of Common Ground

Representor Details

| Web Reference Number | WF0365                                       |
|----------------------|--|
| Type of Submission   | Web submission                               |
| Full Name            | Mr Paul O'Brien                              |
| Organisation         |  |
| Address              | 8 Langholm Road<br>Garswood<br>Wigan WN4 0SE |
| Agent Details        |  |

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

| Development of Housing To the South of Billinge<br>Road and West of Smock Lane Policy LPA05 Site<br>1HA |
|---|
|   |
|   |
|   |
|   |
|   |
|   |

4. Do you consider the St Helens Borough Local Plan 2020-2035:

| Is legally compliant?                | Yes |
|--------------------------------------|-----|
| Is sound?                            | No  |
| Complies with the duty to cooperate? | No  |

### 5. If you consider the Local Plan is unsound, it because it is not:

Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

The council should be put to strict proof of its population estimates. The population of St Helens has — been in decline since 1981. Where are all the extra people coming from?

One of the purposes of the greenbelt is to assist in urban regeneration by encouraging the reuse of derelict and other urban land. Using greenbelt fails to encourage fails to encourage this.

The release of greenbelt will cause significant harm to the purposes of the greenbelt.

Housing in this area isn't sustainable because of the lack of school places, doctors surgeries, bus routes and other services. The use of cars is being encouraged because of the lack of facilities.

There is no statement of common ground with neighbouring authorities.

The access to the site on either Billinge Road or Garswood Road would be inadequate. Any \_\_\_\_\_ necessary highway works must be funded by the developer and NOT council tax payers \_\_\_\_\_

7. Please set out modification(s) you consider are necessary
Delete this land from the proposed removal from the greenbelt

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date 3/4/2019 3:51:58 PM

Representor Details

| Web Reference Number | WF0366  |
|----------------------|---|
| Type of Submission   | Web submission  |
| Full Name            | Mr Paul O'Brien   |
| Organisation         | CV CV DECKE STATE OF THE STATE |
| Address              | 8 Langholm Road<br>Garswood<br>Wigan WN4 OSE  |
| Agent Details        |   |

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

| Policy   | Safeguarded land to the north of Billinge Road Policy LPA08 Site 1HS |
|--|--|
| Paragraph / diagram / table                                      |  |
| Policies Map   |  |
| Sustainability Appraisal / Strategic<br>Environmental Assessment |  |
| Habitats Regulation Assessment                                   |  |
| Other documents  |  |
|  |  |

4. Do you consider the St Helens Borough Local Plan 2020-2035:

| Is legally compliant?                | Yes |
|--------------------------------------|-----|
| Is sound?                            | No  |
| Complies with the duty to cooperate? | No  |

5. If you consider the Local Plan is unsound, it because it is not:

Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

The council should be put to strict proof of its population estimates. The population of St Helens has — been in decline since 1981. Where are all the extra people coming from?

One of the purposes of the greenbelt is to assist in urban regeneration by encouraging the reuse of derelict and other urban land. Using greenbelt fails to encourage fails to encourage this.

The release of greenbelt will cause significant harm to the purposes of the greenbelt.

Housing in this area isn't sustainable because of the lack of school places, doctors surgeries, bus routes and other services. The use of cars is being encouraged because of the lack of facilities. \_\_\_\_\_\_

There is no statement of common ground with neighbouring authorities.

7. Please set out modification(s) you consider are necessary
Delete this land from the proposed removal from the greenbelt

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

| Despense Date | 3/4/2019 3:50:14 PM  |
|---------------|----------------------|
| Response Date | 3/4/2013 3.30.14 F W |

## O-LPAOS 2)-Statement of Common Ground

Representor Details

| Web Reference Number | WF0367   |
|----------------------|--|
| Type of Submission   | Web submission   |
| Full Name            | Mr Paul O'Brien  |
| Organisation         | The state of the same and the s |
| Address              | 8 Langholm Road<br>Garswood<br>Wigan WN4 OSE   |
| Agent Details        |  |

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

| Policy   | Development of Housing To the South of Billinge<br>Road and West of Smock Lane Policy LPA05 Site<br>1HA |
|--|---|
| Paragraph / diagram / table                                      |   |
| Policies Map   |   |
| Sustainability Appraisal / Strategic<br>Environmental Assessment |   |
| Habitats Regulation Assessment                                   |   |
| Other documents  |   |

4. Do you consider the St Helens Borough Local Plan 2020-2035:

| Is legally compliant?                | Yes |
|--------------------------------------|-----|
| Is sound?                            | No  |
| Complies with the duty to cooperate? | No  |

#### 5. If you consider the Local Plan is unsound, it because it is not:

Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

The council should be put to strict proof of its population estimates. The population of St Helens has been in decline since 1981. Where are all the extra people coming from?

One of the purposes of the greenbelt is to assist in urban regeneration by encouraging the reuse of

derelict and other urban land. Using greenbelt fails to encourage fails to encourage this. The release of greenbelt will cause significant harm to the purposes of the greenbelt.

Housing in this area isn't sustainable because of the lack of school places, doctors surgeries, bus routes and other services. The use of cars is being encouraged because of the lack of facilities.—

There is no statement of common ground with neighbouring authorities.

### 7. Please set out modification(s) you consider are necessary

Delete this land from the proposed removal from the greenbelt

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

(1)

No, I do not wish to participate at the oral examination

| Response Date | 3/4/2019 3:48:39 PM |
|---------------|---------------------|

## O-LPAOS Q-Statement of Common Ground

Representor Details

| maprosonital permits |  |
|----------------------|--|
| Web Reference Number | WF0368   |
| Type of Submission   | Web submission   |
| Full Name            | Mr Paul O'Brien  |
| Organisation         | A CONTRACT C |
| Address              | 8 Langholm Road<br>Garswood<br>Wigan WN4 0SE   |
| Agent Details        |  |

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

| Policy   | Development of Housing Florida Farm South<br>Policy LPA05 Site 2HA |
|--|--|
| Paragraph / diagram / table                                      |  |
| Policies Map   |  |
| Sustainability Appraisal / Strategic<br>Environmental Assessment |  |
| Habitats Regulation Assessment                                   |  |
| Other documents  |  |
|  |  |

4. Do you consider the St Helens Borough Local Plan 2020-2035:

| Is legally compliant?                | Yes    |
|--------------------------------------|--------|
| Is sound?                            | No ~~. |
| Complies with the duty to cooperate? | No     |

5. If you consider the Local Plan is unsound, it because it is not:

Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

The council should be put to strict proof of its population estimates. The population of St Helens has—been in decline since 1981. Where are all the extra people coming from?

One of the purposes of the greenbelt is to assist in urban regeneration by encouraging the reuse of derelict and other urban land. Using greenbelt fails to encourage fails to encourage this.

The release of greenbelt will cause significant harm to the purposes of the greenbelt.

Housing in this area isn't sustainable because of the lack of school places, doctors surgeries, bus routes and other services. The use of cars is being encouraged because of the lack of facilities.

There is no statement of common ground with neighbouring authorities.

7. Please set out modification(s) you consider are necessary Delete this land from the proposed removal from the greenbelt

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

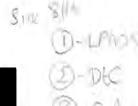
No, I do not wish to participate at the oral examination

| Response Date | 3/4/2019 3:46:48 PM |
|---------------|---------------------|

UL0096



Policy No. LPA05 and LPA06 Sharon O'Connor to: 'planningpolicy@sthelens.gov.uk' 12/03/2019 14:23



#### TO WHOM IT MAY CONCERN

I would like to make my comments of the above policy numbers.

In respect of the overall figures in the Plan;

- there are no exceptional circumstances to justify not using the standard method to calculate housing need
- the economic analysis is flawed and based on over-optimistic assumptions
- the level of land needed is therefore not as high as set out in the Local Plan
- therefore there are no exceptional circumstances to change Green belt boundaries
- other reasonable alternatives have not been fully explored, including lower target figures and using more previously developed land
- these alternatives will have less impact on the environment and lead to less need for new infrastructure
- the Council have failed to co-operate with other councils and have not published any statement(s) of common ground

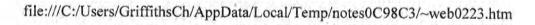
For these reasons and unless the plan is significantly modified it should fail both the legal tests it has to pass and the tests of soundness.

SHBC should amend the plan by retaining the Green Belt, reducing the housing and employment targets and by allocating more previously developed land.

Specific points on site HA8 (Rookery Lane)

- Only 4 sites score 4 negatives\* (red) on the Sustainability Appraisal, and the other 3 have all been discarded. So SHBC's own assessment is that HA8 is the least appropriate Green Belt site allocated for housing in Phase 1.
- This site is next to an Industrial area and subject to the risks associated with industrial activity such as pollution and even explosions, both of which have been recorded recently. Other sites have been excluded during the site assessment phase due to being next to similar industrial employment land for example see SHLAA 2016 site assessment ref 16m & 142.
- The site is Grade 1 Agricultural Land and is actively farmed and provides employment in the agricultural sector which are threatened by the proposed removal of this site from the Green Belt. The SHLP is intended to promote employment and economic growth yet this will have the opposite effect.
- There has been no consultation with Natural England over the loss of Grade 1 Agricultural (BMV) Land.

Kind regards
SHARON OCONNOR
12 MILL LANE
RAINFORD
ST HELENS
MERSEYSIDE
WA11 8LW





Bold St Helens Merseyside WA9 4FZ

Dear Sir / Madam.

As an extremely concerned resident of Bold, I write in response to the recently published St Helens Borough Local Plan 2020 – 2035. From the outset I strongly oppose this plan.

My rational is due to several significant factors,

- Savid Javid Secretary of State for Home and Communities and Local Government has stated in Parliament that 'Greenbelt is absolutely sacrosanct' This was echoed in the conservative manifesto.
- Greenbelts primary purpose is to prevent urban sprawl, but in doing this it provides
  countryside to the people. It has a huge environmental value. In the face of climate change it
  has an increasingly important role in storing carbon and preventing flooding and is a vital
  economic resource for food security and soil protection.
- Britain has lost half of its wildlife a 56% decline of farmland birds between 1970 and 2015.
   Since 2016 the number of critically endangered species in the UK has reached 165. The UK now considered one of the most nature depleted countries in the world. These fields are home to may of these species, and development of these fields will decimate their habitat.
- It should be noted that for every new house built on greenbelt land it is estimated that between four and seven additional car trips would be generated per week.
- In St Helens 936 houses have been classed as long-term empty. St Helens Council Tax figures from October 2018 show that there were 2853 unused homes in the borough.

In view of the above, the following areas.

LPSD 4HA **2988 Houses** and LPSD 5HA **569 Houses**, must be removed from the Local Borough Plan.

Yours faithfully,



S & LEB SOID



## St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

(For official use only)

Please also read the Representation Form Guidance Note that is available with this form, or online at: www.sthelens.gov.uk/localplan

Please ensure the form is returned to us by no later than 5pm on Wednesday 13th March 2019. Any comments received after this deadline cannot be accepted.

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

#### PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

| 1. Your Details (we will correspond via your agent) Title:                                   | 2. Your Agent's Details (if applicable)  Title:   |
|--|---|
| First Name: Eller  | First name:   |
| Last Name: O'Sonull  | First name:Last Name:   |
| Organisation/company:  | Organisation/company:   |
| Address: 8 Danel Ane   | Address:  |
| 1 1 1 1 1 1 1 1 1  | Postcode:   |
| Tel No:  | Tel No:   |
| Mobile No:   | Mobile No:  |
| Email:   | Email:  |
| Signature:   | Date: 13 4 1 9  |
| Please be aware that anonymous forms can<br>considered you MUST include your details a       | not be accepted and that in order for your comments to be above.  |
| Would you like to be kept updated of futu  | re stages of the St Helens Borough Local Plan 2020-2035? tion, publication of the Inspector's recommendations and |
| Yes (via email)  | ☐ No  |
| Please note - email is the Council's preferre<br>we will contact you by your postal address. | ed method of communication. If no email address is provided,  |

#### **RETURN DETAILS**

Please return your completed form to us by no later than 5pm on Wednesday 13th March 2019 by:

post to:

Local Plan St.Helens Council Town Hall Victoria Square St Helens WA10 1HP

or by hand delivery to:

Ground Floor Reception St. Helens Town Hall

(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

#### **FURTHER INFORMATION**

If you require further information please see the FAQs on our website: www.sthelens.gov.uk/localplan

If you still need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk

Telephone: 01744 676190

#### **NEXT STEPS**

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

#### DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: www.sthelens.gov.uk/localplan

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

# Please use a separate copy of Part B for each separate comment/representation.

#### PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

| Policy<br>PA05  | Paragraph<br>/ diagram<br>/ table                               | Policies<br>Map  | 1HA        | Sustainability Appraisal/ Strategic Environmental Assessment |                        | Habitats<br>Regulation<br>Assessment |  |
|---|---|------------------|------------|--|------------------------|--------------------------------------|--|
| Other docur<br>document a<br>part/section   |   | ne               |            |  |                        | ,                                    |  |
| 4. Do you c   | onsider the St Hel  | ens Borough L    | ocal Pla   | n 2020-2035 is   |                        |                                      |  |
| Diagra mad  | the Guidance note   | for explanations | of Lega    | Compliance and   | the Tes                | ts of Soundness                      |  |
| ridase read   |   |                  |            |  |                        |                                      |  |
| Legally Cor   |   | Yes 🏋            |            | N  | 0                      | -                                    |  |
|   |   | Yes T            |            | N N  | o<br>o <b>,</b>        |                                      |  |
| Legally Cor<br>Sound?<br>Complies w   |   | Yes 7            |            | N N  | 0                      |                                      |  |
| Legally Cor<br>Sound?   | npliant?  | Yes Y            |            | N N  | o<br>o <b>,</b>        |                                      |  |
| Legally Cor<br>Sound?<br>Complies w<br>Cooperate<br>Please tick as  | npliant?  with the Duty to s appropriate  ansider the Local P   | Yes Yes I        | , is it be | N<br>N<br>N<br>N<br>Cause it is not:                         | 0<br>0 <b>%</b><br>0 C |                                      |  |
| Legally Cor<br>Sound?<br>Complies w<br>Cooperate<br>Please tick as  | rith the Duty to  | Yes Yes I        | , is it be | N<br>N<br>N<br>N<br>Cause it is not:                         | 0<br>0 <b>%</b><br>0 C |                                      |  |
| Legally Cor<br>Sound?<br>Complies w<br>Cooperate<br>Please tick as  | ripliant?  vith the Duty to  s appropriate  Insider the Local P | Yes Yes I        | , is it be | N<br>N<br>N<br>N<br>Cause it is not:                         | 0<br>0 <b>%</b><br>0 C |                                      |  |
| Legally Cor<br>Sound?<br>Complies w<br>Cooperate<br>Please tick as<br>5. If you co<br>Please read                 | ripliant?  vith the Duty to  s appropriate  Insider the Local P | Yes Yes I        | , is it be | N<br>N<br>N<br>N<br>Cause it is not:                         | 0<br>0 <b>%</b><br>0 C |                                      |  |
| Legally Cor<br>Sound?<br>Complies w<br>Cooperate<br>Please tick as<br>5. If you co<br>Please read<br>Positively F | ripliant?  vith the Duty to  s appropriate  Insider the Local P | Yes Yes I        | , is it be | N<br>N<br>N<br>N<br>Cause it is not:                         | 0<br>0 <b>%</b><br>0 C |                                      |  |

Please give details of why you consider the Local Plan is not legally compliant or is ensound or fails to comply with the duty to cooperate. Please he as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

Not justified-the council should be put to strict proof of it's population estimates, as the population of St Helens has declined since 1981. Where are all the extra people coming from? One of the purposes of the Green Belt is to assist in urban regeneration by encouraging the recycling of of derelict and other land. Using Green Belt does not do this. Release of Green Belt will cause significant harm to the purposes of the Green Belt. Houses in this area is not sustainable due to the lack of school places, there will need to be a school built on the new estate as the school run on the estate is very chaotic, with cars parked around the school

causing an obstruction to all road users, this is due to local people living on the estate taking their children to school. Doctor's surgeries, bus routes, parking at the train station is limited and people from the estate, who use the train are parking in Strange Road, School Lane, Station Road and Victoria Road, leaving their cars all day while they use the train. This causes obstruction for buses and other traffic. The use of cars is being encouraged due to lack of facilities. The access to the site on either Billinge Road/Garswood Road is not adequate due to narrow road and lack of pavements. Also the amount of traffic already using these roads is increasing. There are a lot of walkers and it is getting really bad crossing these roads due to the increased amount of traffic. Any necessary highways work must be funded by the developer and not the council tax payer. There is no statement of common ground.

there were four pits. One on the land off Billinge Road, from Simms Lane up to Billinge, one on Arch Lane, two on Garswood Road/Winstanley Road and an open cast on Garswood Road/Winstanley Road. There are mines under the fields especially under 1HA. This will need to be feetered in to the cast of the land of the feetered in the feet

to be factored in to the cost of building the estate.

N.B. The number of children with asthma is increasing due to pollution and there are a significant amount of children in Garswood with asthma. A child has died due to pollution and that is one child too many.

:PAOS



Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say thy this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Due to pollution and extra traffic coming from the new development would it not be better to spread the houses creating villages instead of estates, there is plenty of land? Also, there is two plots of land in Billinge Road where houses have been pulled down. There is also two on Leyland Green Road. Look for other plots as we need the Green Belt for farming. There is a wide road from Billinge to the East Lancs at Carr Mill, Birchley Road/Carr Mill Road. In addition, there is a railway station in Orrell with a bus service from St Helens to Wigan through Orrell every fifteen minutes. Would it help if you use incentives for builders to use brown land, eg free planning permission?

## Please use a separate copy of Part B for each separate comment/representation.

#### PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

| Policy<br>PAO6                               | Paragraph<br>/ diagram<br>/ table                   | Policies             | Assessing                        | ibility<br>al/<br>nental | Habitats Regulation Assessment         |  |
|--|---|----------------------|----------------------------------|--------------------------|--|--|
| Other docun<br>document and<br>part/section) |   | ie                   | (2)                              |                          |  |  |
| 4. Do you co                                 | onsider the St Heli<br>the Guidance note i          | or explanations of l | al Plan 2020-2<br>Legal Complian | 035 is:<br>ce and the T  | ests of Soundness                      |  |
| Legally Com                                  |   | Yes 💍                |                                  | Nc -                     | Nc -                                   |  |
| Sound?                                       |   | Yes 🗆                |                                  | No 🔀                     |  |  |
| Complies wi                                  | th the Duty to                                      | Yes 🗆                |                                  | No C                     |  |  |
| Please read<br>Positively P                  | nsider the Local P<br>the Guidance note<br>repared? | for explanations of  | the Tests of So                  | undness                  |  |  |
| hietified?                                   |   | ×                    |                                  |                          | ***                                    |  |
| Justified?                                   |   |                      |                                  |                          |  |  |
| Effective?                                   | with National Police                                |                      |                                  |                          | ii |  |

will cause significant harm to the purposes of the Green Belt. Houses in this area is not sustainable due to the lack of school places, there will need to be a school built on the new estate as the school run on the estate is very chaotic, with cars parked around the school

causing an obstruction to all road users, this is due to local people living on the estate taking their children to school. Doctor's surgeries, bus routes, parking at the train station is limited and people from the estate, who use the train are parking in Strange Road, School Lane, Station Road and Victoria Road, leaving their cars all day while they use the train. This causes obstruction for buses and other traffic. The use of cars is being encouraged due to lack of facilities. The access to the site on either Billinge Road/Leyland Green Road is not adequate due to narrow road and lack of pavements. Also the amount of traffic already using these roads is increasing. There are a lot of walkers and it is getting really bad crossing these roads due to the increased amount of traffic. . Any necessary highways work must be funded by the developer and not the council tax paver. There is no statement of common ground. 3. There were coal pits in Garswood in the past. there were four pits. One on the land off Billinge Road, from Simms Lane up to Billinge, one on Arch Lane, two on Garswood Road/Winstanley Road and an open cast on Garswood Road/Winstanley Road. There are mines under the fields especially under 1HS This will need to be factored in to the cost of building the estate. N.B. The number of children with asthma is increasing due to pollution and there are a significant amount of children in Garswood with asthma. A child has died due to pollution and that is one child too many. SOARA

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliant with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please continue on a separate sheet if necessary

Due to pollution and extra traffic coming from the new development would it not be better to spread the houses creating villages instead of estates, there is plenty of land? Also, there is two plots of land in Billinge Road where houses have been pulled down. There is also two on Leyland Green Road. Look for other plots as we need the Green Belt for farming. There is a wide road from Billinge to the East Lancs at Carr Mill, Birchley Road/Carr Mill Road. In addition, there is a railway station in Orrell with a bus service from St Helens to Wigan through Orrell every fifteen minutes. Would it help if you use incentives for builders to use brown land, eg free planning permission?

| pase note your representation should cover supporting information necessary to support / just odification, as there will not normally be a substitute of the stage, further submissions will be of matters and issues he/she identifies for expenses. | tify the representation and suggested equent opportunity to make further tion at the publication stage. Inly at the request of the Inspector, based amination. |
|---|--|
| daightean agus  | Colline  |
| No, I do not wish to participate at the oral examination  | Yes, I wish to participate at the oral examination   |
|   |  |
|   |  |
|   | •  |
|   |  |
|   |  |

Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

**Representor Details** 

| Web Reference Number | WF0177              |
|----------------------|---------------------|
| Type of Submission   | Web submission      |
| Full Name            | Mrs Diane O'Donovan |
| Organisation         |                     |
| Address              | The Cottage         |
|                      | Higher Lane         |
|                      | Rainford            |
|                      | St Helens WA11 8NG  |
| Agent Details        |                     |

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

| Policy                               | All policies |
|--------------------------------------|--------------|
| Paragraph / diagram / table          |              |
| Policies Map                         |              |
| Sustainability Appraisal / Strategic |              |
| Environmental Assessment             |              |
| Habitats Regulation Assessment       |              |
| Other documents                      |              |

4. Do you consider the St Helens Borough Local Plan 2020-2035:

| Is legally compliant?                | No |
|--------------------------------------|----|
| Is sound?                            | No |
| Complies with the duty to cooperate? | No |

- 5. If you consider the Local Plan is unsound, it because it is not:
- 6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

There are brownfield sites available - why, then, is Grade 1 Agricultural land, at present under cultivation, being considered?

- 7. Please set out modification(s) you consider are necessary
- 8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

| Response Date | 3/12/2019 5:05:12 PM |
|---------------|----------------------|



## St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

(For official use only)

Please also read the Representation Form Guidance Note that is available with this form, or online at: www.sthelens.gov.uk/localplan

Please ensure the form is returned to us by no later than 5pm on Wednesday 13th March 2019. Any comments received after this deadline cannot be accepted.

This form has two parts;

Part A - Personal Details

1 3 MAY 2019 Part B - Your Representation(s)

#### PART A - YOUR DETAILS

| 1. Your Details (we will correspond via your agent) | 2. Your Agent's Details (if applicable) |
|---|---|
| Title: MP   | Title:First name:                       |
| First Name: PAUL                                    | First name:                             |
| Last Name: ODY                                      | Last Name:                              |
|   | Organisation/company:                   |
| Address: 27 ABBOTS HALL AVE . BOLD                  | Address:                                |
| ST HELENS   |   |
|   | Postcode:                               |
|   | Tel No:                                 |
| Mobile No.  | Mobile No:                              |
| Email:  | mail:                                   |
|   |   |
|   |   |

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you MUST include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

| A | Yes | (via | email) |  |
|---|-----|------|--------|--|
|---|-----|------|--------|--|

Please note - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

#### **RETURN DETAILS**

Please return your completed form to us by no later than 5pm on Wednesday 13th March 2019 by:

post to:

Local Plan

St. Helens Council

Town Hall

Victoria Square

St Helens WA10 1HP

or by hand delivery to:

Ground Floor Reception St. Helens Town Hall

(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

#### **FURTHER INFORMATION**

If you require further information please see the FAQs on our website: www.sthelens.gov.uk/localplan

If you still need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk

Telephone: 01744 676190

#### **NEXT STEPS**

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

#### DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: **www.sthelens.gov.uk/localplan** 

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

#### **Representor Details**

| Web Reference Number | WF0132                |
|----------------------|-----------------------|
| Type of Submission   | Web submission        |
| Full Name            | Mrs Mary Ody          |
| Organisation         |                       |
| Address              | 27 Abbots Hall Avenue |
|                      | Bold                  |
|                      | St Helens Wa94ux      |
| Agent Details        |                       |

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

No

3. To which part of the Local Plan does this representation relate?

| •                                    | •   |
|--------------------------------------|-----|
| Policy                               | Yes |
| Paragraph / diagram / table          |     |
| Policies Map                         | Yes |
| Sustainability Appraisal / Strategic |     |
| Environmental Assessment             |     |
| Habitats Regulation Assessment       |     |
| Other documents                      |     |

#### 4. Do you consider the St Helens Borough Local Plan 2020-2035:

| Is legally compliant?                | No |
|--------------------------------------|----|
| Is sound?                            | No |
| Complies with the duty to cooperate? | No |

#### 5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

My view is the same as the Bold and Clock Face action group. I am in agreement with the issues raised.

#### 7. Please set out modification(s) you consider are necessary

My view is the same as the Bold and Clock Face action group.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

| Response Date | 3/12/2019 9:16:10 PM |
|---------------|----------------------|

**Representor Details** 

| Web Reference Number | WF0134                |
|----------------------|-----------------------|
| Type of Submission   | Web submission        |
| Full Name            | Mr Harry Ody          |
| Organisation         |                       |
| Address              | 27 Abbots Hall Avenue |
|                      | Bold                  |
|                      | St Helens Wa94ux      |
| Agent Details        |                       |

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

No

3. To which part of the Local Plan does this representation relate?

| Policy                               | Yes |
|--------------------------------------|-----|
| Paragraph / diagram / table          |     |
| Policies Map                         | Yes |
| Sustainability Appraisal / Strategic |     |
| Environmental Assessment             |     |
| Habitats Regulation Assessment       |     |
| Other documents                      |     |

#### 4. Do you consider the St Helens Borough Local Plan 2020-2035:

| Is legally compliant?                | No |
|--------------------------------------|----|
| Is sound?                            | No |
| Complies with the duty to cooperate? | No |

#### 5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

My view is the same as the Bold and Clock Face action group. I am in agreement with the issues raised.

7. Please set out modification(s) you consider are necessary

Same as the same as the Bold and Clock Face action group.

#### 8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

| Response Date | 3/12/2019 9:13:00 PM |
|---------------|----------------------|

# RO1332

| Web Reference Number | WF0135                |
|----------------------|-----------------------|
| Type of Submission   | Web submission        |
| Full Name            | Mrs Sadie Ody         |
| Organisation         |                       |
| Address              | 27 Abbots Hall Avenue |
|                      | Bold                  |
|                      | St Helens Wa94ux      |
| Agent Details        |                       |

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

#### 3. To which part of the Local Plan does this representation relate?

| Policy                               | Yes |
|--------------------------------------|-----|
| Paragraph / diagram / table          |     |
| Policies Map                         | Yes |
| Sustainability Appraisal / Strategic |     |
| Environmental Assessment             |     |
| Habitats Regulation Assessment       |     |
| Other documents                      |     |

### 4. Do you consider the St Helens Borough Local Plan 2020-2035:

| Is legally compliant?                | No |
|--------------------------------------|----|
| Is sound?                            | No |
| Complies with the duty to cooperate? | No |

#### 5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

My views are the same as the  $\operatorname{Bold}$  and  $\operatorname{Clock}$  Face action group.

I am in agreement with the issues raised.

### 7. Please set out modification(s) you consider are necessary

No correspondence and no notice given. Other brown land areas should be looked at first. Also protective wildlife on areas identified.

## 8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

| Response Date | 3/12/2019 9:08:33 PM |
|---------------|----------------------|

# RO1333

| Web Reference Number | WF0417                |
|----------------------|-----------------------|
| Type of Submission   | Web submission        |
| Full Name            | Master Hayden O'Grady |
| Organisation         | NA NA                 |
| Address              | 35 Elgin Avenue       |
|                      | Garswood wn4 0rh      |
| Agent Details        |                       |

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

No

3. To which part of the Local Plan does this representation relate?

| or to trinoin part of this good that does this top coordinate. |                  |
|--|------------------|
| Policy   | LPA06 - Site 1HS |
| Paragraph / diagram / table                                    |                  |
| Policies Map   |                  |
| Sustainability Appraisal / Strategic                           |                  |
| Environmental Assessment                                       |                  |
| Habitats Regulation Assessment                                 |                  |
| Other documents  |                  |

#### 4. Do you consider the St Helens Borough Local Plan 2020-2035:

| Is legally compliant?                | No |
|--------------------------------------|----|
| Is sound?                            | No |
| Complies with the duty to cooperate? | No |

### 5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

## 6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

NOT JUSTIFIED - The council should be made to prove of its population estimates as the population of St Helens has been in decline since 1981. Where are all the extra people coming from to move into the houses?

One of the

purposes of having a Greenbelt is to assist in urban regeneration by encouraging the redevelopment of derelict and other urban land. Using Greenbelt fails to encorage this.

The release of land from the greenbelt will cause significant harm to the purposes of the Greenbelt. Housing in this area isn't sustainable because of the lack of school places, doctors surgeries, bus routes, roads and inferstructure and other services. The development ofthis land for hosing will encourage the use of cars because of the lack of facilites.

The access to the site on either Billinge Road or Garswood would be inadequate. Any necessary highways works must be funded by the developer and not the council Tax payers.

There is no statement of common ground with neighbouring authorities.

### 7. Please set out modification(s) you consider are necessary

Delete this land from the list of land proposed to be removed from the greenbelt

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

| Response Date | 2/28/2019 2:12:03 PM |
|---------------|----------------------|

| Web Reference Number | WF0424                |
|----------------------|-----------------------|
| Type of Submission   | Web submission        |
| Full Name            | Master Hayden O'Grady |
| Organisation         | NA                    |
| Address              | 35 Elgin Avenue       |
|                      | Garswood wn4 0rh      |
| Agent Details        |                       |

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

No

### 3. To which part of the Local Plan does this representation relate?

| Policy                               | LPA05 - Site 1HA |
|--------------------------------------|------------------|
| Paragraph / diagram / table          |                  |
| Policies Map                         |                  |
| Sustainability Appraisal / Strategic |                  |
| Environmental Assessment             |                  |
| Habitats Regulation Assessment       |                  |
| Other documents                      |                  |

### 4. Do you consider the St Helens Borough Local Plan 2020-2035:

| Is legally compliant?                | No |
|--------------------------------------|----|
| Is sound?                            | No |
| Complies with the duty to cooperate? | No |

### 5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

## 6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

Not justified - The council should be put to strictly prove of its population estimates. The population of St Helens has been in decline since 1981. Where are all the extra people coming from? One of the purposes of the Greenbelt is to assist in urban regeneration by encouraging the recycling of derelict and other urban land. Using Greenbelt fails to encourage this.

The release of greenbelt will cause significant harm to the purposes of the Greenbelt.

Housing in this area isn't sustainable because of the lack of school places, doctors surgeries, bus routes and other services. The use of cars is being encouraged because of the lack of facilities.

The access to the site on either Billinge Road or Garswood would be inadequate. Any necessary highways works must be funded by the developer and not the council Tax payers.

There is no statement of common ground with neighboring authorities.

### 7. Please set out modification(s) you consider are necessary

Delete this land from the proposed removal from greenbelt

## 8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

| Response Date | 2/28/2019 12:31:44 PM      |
|---------------|----------------------------|
| Response Date | 2,20,2013 12:01: : : : : : |

| Web Reference Number | WF0429            |
|----------------------|-------------------|
| Type of Submission   | Web submission    |
| Full Name            | Mr Hayden O'Grady |
| Organisation         | NA                |
| Address              | 35 Elgin Avenue   |
|                      | Garswood wn4 0rh  |
| Agent Details        |                   |

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

No

### 3. To which part of the Local Plan does this representation relate?

| Policy                               | LPA06 - Site 2ES |
|--------------------------------------|------------------|
| Paragraph / diagram / table          |                  |
| Policies Map                         |                  |
| Sustainability Appraisal / Strategic |                  |
| Environmental Assessment             |                  |
| Habitats Regulation Assessment       |                  |
| Other documents                      |                  |

#### 4. Do you consider the St Helens Borough Local Plan 2020-2035:

| Is legally compliant?                | No |
|--------------------------------------|----|
| Is sound?                            | No |
| Complies with the duty to cooperate? | No |

### 5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

## 6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

"Not justified - the council should be put to strict proof of the need for this type of development, in this position and on this scale. As this is allocated as Safeguarded until after 2035 & given the lifespan of this type of warehouse development, the site should remain in the greenbelt so that the whole question of need can be re-evaluated at the end of the local plan period.

One of the purposes of the greenbelt is to assist in urban regeneration by encouraging the recycling of derelict and other urban land. Using greenbelt fails to encourage this.

The release of greenbelt will cause significant harm to the purposes of the greenbelt.

The council has already granted planning permission in the greenbelt in respect of site 2EA - Florida Farm North, less than two miles from this site and has also received applications for similar development at 5EA, land to the west of Haydock lane and 8EA, Parkside west, newton le willows. High volumes of predicted traffic will add to the already over capacity on junction 23 of M6. There is no statement of common ground with neighbouring authorities."

### 7. Please set out modification(s) you consider are necessary

Delete this land from the proposed removal from the Greenbelt

### 8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

| Response Date | 2/28/2019 11:55:20 AM |
|---------------|-----------------------|

# RO1334

| Web Reference Number | WF0418               |
|----------------------|----------------------|
| Type of Submission   | Web submission       |
| Full Name            | Miss Rebecca O'Grady |
| Organisation         | NA                   |
| Address              | 35 Elgin Avenue      |
|                      | Garswood wn4 0rh     |
| Agent Details        |                      |

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

No

3. To which part of the Local Plan does this representation relate?

| Policy                               | LPA06 - Site 1HS |
|--------------------------------------|------------------|
| Paragraph / diagram / table          |                  |
| Policies Map                         |                  |
| Sustainability Appraisal / Strategic |                  |
| Environmental Assessment             |                  |
| Habitats Regulation Assessment       |                  |
| Other documents                      |                  |

### 4. Do you consider the St Helens Borough Local Plan 2020-2035:

| Is legally compliant?                | No |
|--------------------------------------|----|
| Is sound?                            | No |
| Complies with the duty to cooperate? | No |

### 5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

## 6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

NOT JUSTIFIED - The council should be made to prove of its population estimates as the population of St Helens has been in decline since 1981. Where are all the extra people coming from to move into the houses?

One of the

purposes of having a Greenbelt is to assist in urban regeneration by encouraging the redevelopment of derelict and other urban land. Using Greenbelt fails to encorage this.

The release of land from the greenbelt will cause significant harm to the purposes of the Greenbelt. Housing in this area isn't sustainable because of the lack of school places, doctors surgeries, bus routes, roads and inferstructure and other services. The development of this land for hosing will encourage the use of cars because of the lack of facilites.

The access to the site on either Billinge Road or Garswood would be inadequate. Any necessary highways works must be funded by the developer and not the council Tax payers.

There is no statement of common ground with neighbouring authorities.

### 7. Please set out modification(s) you consider are necessary

Delete this land from the list of proposed land to be removed from the greenbelt

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

| Response Date | 2/28/2019 2:09:07 PM |
|---------------|----------------------|

| Web Reference Number | WF0425               |
|----------------------|----------------------|
| Type of Submission   | Web submission       |
| Full Name            | Miss Rebecca O'Grady |
| Organisation         | NA                   |
| Address              | 35 Elgin Avenue      |
|                      | Garswood WN4 0RH     |
| Agent Details        |                      |

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

No

### 3. To which part of the Local Plan does this representation relate?

| Policy                               | LPA05 - Site 1HA |
|--------------------------------------|------------------|
| Paragraph / diagram / table          |                  |
| Policies Map                         |                  |
| Sustainability Appraisal / Strategic |                  |
| Environmental Assessment             |                  |
| Habitats Regulation Assessment       |                  |
| Other documents                      |                  |

### 4. Do you consider the St Helens Borough Local Plan 2020-2035:

| Is legally compliant?                | No |
|--------------------------------------|----|
| Is sound?                            | No |
| Complies with the duty to cooperate? | No |

### 5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

## 6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

Not justified - The council should be put to strictly prove of its population estimates. The population of St Helens has been in decline since 1981. Where are all the extra people coming from? One of the purposes of the Greenbelt is to assist in urban regeneration by encouraging the recycling of derelict and other urban land. Using Greenbelt fails to encourage this.

The release of greenbelt will cause significant harm to the purposes of the Greenbelt.

Housing in this area isn't sustainable because of the lack of school places, doctors surgeries, bus routes and other services. The use of cars is being encouraged because of the lack of facilities.

The access to the site on either Billinge Road or Garswood would be inadequate. Any necessary highways works must be funded by the developer and not the council Tax payers.

There is no statement of common ground with neighboring authorities.

### 7. Please set out modification(s) you consider are necessary

Delete this land from the proposed removal from Greenbelt

## 8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

| Response Date | 2/28/2019 12:29:04 PM |
|---------------|-----------------------|

| Web Reference Number | WF0428               |
|----------------------|----------------------|
| Type of Submission   | Web submission       |
| Full Name            | Miss Rebecca O'Grady |
| Organisation         | NA                   |
| Address              | 35 Elgin Avenue      |
|                      | Garswood wn4 0rh     |
| Agent Details        |                      |

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

No

### 3. To which part of the Local Plan does this representation relate?

| or to which part of the Local Flan does this representation relate. |                  |
|---|------------------|
| Policy  | LPA06 - Site 2ES |
| Paragraph / diagram / table   |                  |
| Policies Map  |                  |
| Sustainability Appraisal / Strategic                                |                  |
| Environmental Assessment  |                  |
| Habitats Regulation Assessment                                      |                  |
| Other documents   |                  |

### 4. Do you consider the St Helens Borough Local Plan 2020-2035:

| Is legally compliant?                | No |
|--------------------------------------|----|
| Is sound?                            | No |
| Complies with the duty to cooperate? | No |

### 5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

## 6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

"Not justified - the council should be put to strict proof of the need for this type of development, in this position and on this scale. As this is allocated as Safeguarded until after 2035 & given the lifespan of this type of warehouse development, the site should remain in the greenbelt so that the whole question of need can be re-evaluated at the end of the local plan period.

One of the purposes of the greenbelt is to assist in urban regeneration by encouraging the recycling of derelict and other urban land. Using greenbelt fails to encourage this.

The release of greenbelt will cause significant harm to the purposes of the greenbelt.

The council has already granted planning permission in the greenbelt in respect of site 2EA - Florida Farm North, less than two miles from this site and has also received applications for similar development at 5EA, land to the west of Haydock lane and 8EA, Parkside west, newton le willows. High volumes of predicted traffic will add to the already over capacity on junction 23 of M6. There is no statement of common ground with neighbouring authorities."

### 7. Please set out modification(s) you consider are necessary

Delete this land from the proposed removal from the greenbelt

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

| Response Date | 2/28/2019 12:00:30 PM |
|---------------|-----------------------|

# RO1335

| Web Reference Number | WF0419            |
|----------------------|-------------------|
| Type of Submission   | Web submission    |
| Full Name            | Mr Andrew O'Grady |
| Organisation         | NA                |
| Address              | 35 Elgin Avenue   |
|                      | Garswood wn4 0rh  |
| Agent Details        |                   |

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

No

3. To which part of the Local Plan does this representation relate?

| Policy                               | LPA06 - Site 1HS |
|--------------------------------------|------------------|
| Paragraph / diagram / table          |                  |
| Policies Map                         |                  |
| Sustainability Appraisal / Strategic |                  |
| Environmental Assessment             |                  |
| Habitats Regulation Assessment       |                  |
| Other documents                      |                  |

### 4. Do you consider the St Helens Borough Local Plan 2020-2035:

| Is legally compliant?                | No |
|--------------------------------------|----|
| Is sound?                            | No |
| Complies with the duty to cooperate? | No |

### 5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

## 6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

NOT JUSTIFIED - The council should be made to prove of its population estimates as the population of St Helens has been in decline since 1981. Where are all the extra people coming from to move into the houses?

One of the

purposes of having a Greenbelt is to assist in urban regeneration by encouraging the redevelopment of derelict and other urban land. Using Greenbelt fails to encorage this.

The release of land from the greenbelt will cause significant harm to the purposes of the Greenbelt. Housing in this area isn't sustainable because of the lack of school places, doctors surgeries, bus routes, roads and inferstructure and other services. The development of this land for hosing will encourage the use of cars because of the lack of facilites.

The access to the site on either Billinge Road or Garswood would be inadequate. Any necessary highways works must be funded by the developer and not the council Tax payers.

There is no statement of common ground with neighbouring authorities.

### 7. Please set out modification(s) you consider are necessary

Delete this land from the proposed removal from the greenbelt

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

| Response Date | 2/28/2019 2:06:30 PM |
|---------------|----------------------|

| Web Reference Number | WF0426            |
|----------------------|-------------------|
| Type of Submission   | Web submission    |
| Full Name            | Mr Andrew O'Grady |
| Organisation         | NA                |
| Address              | 35 Elgin Avenue   |
|                      | Garswood wn4 0rh  |
| Agent Details        |                   |

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

No

### 3. To which part of the Local Plan does this representation relate?

| Policy                               | LPA05 - Site 1HA |
|--------------------------------------|------------------|
| Paragraph / diagram / table          |                  |
| Policies Map                         |                  |
| Sustainability Appraisal / Strategic |                  |
| Environmental Assessment             |                  |
| Habitats Regulation Assessment       |                  |
| Other documents                      |                  |

### 4. Do you consider the St Helens Borough Local Plan 2020-2035:

| Is legally compliant?                | No |
|--------------------------------------|----|
| Is sound?                            | No |
| Complies with the duty to cooperate? | No |

### 5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

## 6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

Not justified - The council should be put to strictly prove of its population estimates. The population of St Helens has been in decline since 1981. Where are all the extra people coming from? One of the purposes of the Greenbelt is to assist in urban regeneration by encouraging the recycling of derelict and other urban land. Using Greenbelt fails to encourage this.

The release of greenbelt will cause significant harm to the purposes of the Greenbelt.

Housing in this area isn't sustainable because of the lack of school places, doctors surgeries, bus routes and other services. The use of cars is being encouraged because of the lack of facilities.

The access to the site on either Billinge Road or Garswood would be inadequate. Any necessary highways works must be funded by the developer and not the council Tax payers.

There is no statement of common ground with neighboring authorities.

### 7. Please set out modification(s) you consider are necessary

Delete this land from the proposed removal from the greenbelt

## 8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

| Response Date | 2/28/2019 12:24:24 PM |
|---------------|-----------------------|
| Response Date | 2/28/2019 12.24.24 PW |

| Web Reference Number | WF0433            |
|----------------------|-------------------|
| Type of Submission   | Web submission    |
| Full Name            | Mr Andrew O'Grady |
| Organisation         | NA                |
| Address              | 35 Elgin Avenue   |
|                      | Garswood wn4 0rh  |
| Agent Details        |                   |

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

No

#### 3. To which part of the Local Plan does this representation relate?

| Policy                               | LPA06 - Site 2ES |
|--------------------------------------|------------------|
| Paragraph / diagram / table          |                  |
| Policies Map                         |                  |
| Sustainability Appraisal / Strategic |                  |
| Environmental Assessment             |                  |
| Habitats Regulation Assessment       |                  |
| Other documents                      |                  |

#### 4. Do you consider the St Helens Borough Local Plan 2020-2035:

| Is legally compliant?                | No |
|--------------------------------------|----|
| Is sound?                            | No |
| Complies with the duty to cooperate? | No |

### 5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

## 6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

Not justified - the council should be put to strict proof of the need for this type of development, in this position and on this scale. As this is allocated as Safeguarded until after 2035 & given the lifespan of this type of warehouse development, the site should remain in the greenbelt so that the whole question of need can be re-evaluated at the end of the local plan period.

One of the purposes of the greenbelt is to assist in urban regeneration by encouraging the recycling of derelict and other urban land. Using greenbelt fails to encourage this.

The release of greenbelt will cause significant harm to the purposes of the greenbelt.

The council has already granted planning permission in the greenbelt in respect of site 2EA - Florida Farm North, less than two miles from this site and has also received applications for similar development at 5EA, land to the west of Haydock lane and 8EA, Parkside west, newton le willows. High volumes of predicted traffic will add to the already over capacity on junction 23 of M6. There is no statement of common ground with neighbouring authorities.

### 7. Please set out modification(s) you consider are necessary

Delete this land from the proposed removal from greenbelt

### 8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

| Response Date | 2/28/2019 10:29:52 AM |
|---------------|-----------------------|

# RO1336

| Web Reference Number | WF0420            |
|----------------------|-------------------|
| Type of Submission   | Web submission    |
| Full Name            | Mrs Sarah O'Grady |
| Organisation         | NA                |
| Address              | 35 Elgin Avenue   |
|                      | Garswood wn4 0rh  |
| Agent Details        |                   |

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

### 3. To which part of the Local Plan does this representation relate?

| Policy                               | LPA06 - Site 1HS |
|--------------------------------------|------------------|
| Paragraph / diagram / table          |                  |
| Policies Map                         |                  |
| Sustainability Appraisal / Strategic |                  |
| Environmental Assessment             |                  |
| Habitats Regulation Assessment       |                  |
| Other documents                      |                  |

### 4. Do you consider the St Helens Borough Local Plan 2020-2035:

| Is legally compliant?                | No |
|--------------------------------------|----|
| Is sound?                            | No |
| Complies with the duty to cooperate? | No |

### 5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

## 6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

NOT JUSTIFIED - The council should be made to prove of its population estimates as the population of St Helens has been in decline since 1981. Where are all the extra people coming from to move into the houses?

One of the

purposes of having a Greenbelt is to assist in urban regeneration by encouraging the redevelopment of derelict and other urban land. Using Greenbelt fails to encorage this.

The release of land from the greenbelt will cause significant harm to the purposes of the Greenbelt. Housing in this area isn't sustainable because of the lack of school places, doctors surgeries, bus routes, roads and inferstructure and other services. The development of this land for hosing will encourage the use of cars because of the lack of facilites.

The access to the site on either Billinge Road or Garswood would be inadequate. Any necessary highways works must be funded by the developer and not the council Tax payers.

There is no statement of common ground with neighbouring authorities.

### 7. Please set out modification(s) you consider are necessary

Delete this land from the proposed removal from the Greenbelt

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

| Response Date | 2/28/2019 2:03:02 PM |
|---------------|----------------------|
|---------------|----------------------|

| Web Reference Number | WF0427            |
|----------------------|-------------------|
| Type of Submission   | Web submission    |
| Full Name            | Mrs Sarah O'Grady |
| Organisation         | NA                |
| Address              | 35 Elgin Avenue   |
|                      | Garswood wn4 0rh  |
| Agent Details        |                   |

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

### 3. To which part of the Local Plan does this representation relate?

| Policy                               | LPA05 - Site 1HA |
|--------------------------------------|------------------|
| Paragraph / diagram / table          |                  |
| Policies Map                         |                  |
| Sustainability Appraisal / Strategic |                  |
| Environmental Assessment             |                  |
| Habitats Regulation Assessment       |                  |
| Other documents                      |                  |

### 4. Do you consider the St Helens Borough Local Plan 2020-2035:

| Is legally compliant?                | No |
|--------------------------------------|----|
| Is sound?                            | No |
| Complies with the duty to cooperate? | No |

### 5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

## 6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

Not justified - The council should be put to strictly prove of its population estimates. The population of St Helens has been in decline snce 1981. Where are all the extra people coming from ? One of the purposes of the Greenbelt is to assist in urban regeneration by encouraging the recycling of derelict and other urban land. Using Greenbelt fails to encourage this.

The release of greenbelt will cause significant harm to the purposes of the Greenbelt.

Housing in this area isn't sustainable because of the lack of school places, doctors surgeries, bus routes and other services. The use of cars is being encouraged because of the lack of facilities.

The access to the site on either Billinge Road or Garswood would be inadequate. Any necessary highways works must be funded by the developer and not the council Tax payers.

There is no statement of common ground with neighboring authorities.

### 7. Please set out modification(s) you consider are necessary

Delete this land from the proposed removal from the Greenbelt

## 8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

| Response Date | 2/28/2019 12:19:08 PM |
|---------------|-----------------------|

| Web Reference Number | WF0434            |
|----------------------|-------------------|
| Type of Submission   | Web submission    |
| Full Name            | Mrs Sarah O'Grady |
| Organisation         | NA                |
| Address              | 35 Elgin Avenue   |
|                      | Garswood wn4 0rh  |
| Agent Details        |                   |

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

### 3. To which part of the Local Plan does this representation relate?

| Policy                               | LPA06 - Site 2ES |
|--------------------------------------|------------------|
| Paragraph / diagram / table          |                  |
| Policies Map                         |                  |
| Sustainability Appraisal / Strategic |                  |
| Environmental Assessment             |                  |
| Habitats Regulation Assessment       |                  |
| Other documents                      |                  |

#### 4. Do you consider the St Helens Borough Local Plan 2020-2035:

| Is legally compliant?                | No |
|--------------------------------------|----|
| Is sound?                            | No |
| Complies with the duty to cooperate? | No |

### 5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

## 6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

Not justified - the council should be put to strict proof of the need for this type of development, in this position and on this scale. As this is allocated as Safeguarded until after 2035 & given the lifespan of this type of warehouse development, the site should remain in the greenbelt so that the whole question of need can be re-evaluated at the end of the local plan period.

One of the purposes of the greenbelt is to assist in urban regeneration by encouraging the recycling of derelict and other urban land. Using greenbelt fails to encourage this.

The release of greenbelt will cause significant harm to the purposes of the greenbelt.

The council has already granted planning permission in the greenbelt in respect of site 2EA - Florida Farm North, less than two miles from this site and has also received applications for similar development at 5EA, land to the west of Haydock lane and 8EA, Parkside west, newton le willows. High volumes of predicted traffic will add to the already over capacity on junction 23 of M6. There is no statement of common ground with neighbouring authorities.

### 7. Please set out modification(s) you consider are necessary

Delete this land from the proposed removal from greenbelt

### 8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

| Response Date | 2/28/2019 10:21:38 AM |
|---------------|-----------------------|

# RO1337

| Web Reference Number | WF0024            |
|----------------------|-------------------|
| Type of Submission   | Web submission    |
| Full Name            | Mr Daniel O'Hagan |
| Organisation         |                   |
| Address              | 46 Forest Grove   |
|                      | Eccleston Park    |
|                      | Prescot           |
|                      | Merseyside L342RZ |
| Agent Details        |                   |

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

### 3. To which part of the Local Plan does this representation relate?

| Policy                               | LPA06 |
|--------------------------------------|-------|
| Paragraph / diagram / table          | 3HS   |
| Policies Map                         |       |
| Sustainability Appraisal / Strategic | YES   |
| Environmental Assessment             |       |
| Habitats Regulation Assessment       |       |
| Other documents                      |       |

#### 4. Do you consider the St Helens Borough Local Plan 2020-2035:

| Is legally compliant?                | Yes |
|--------------------------------------|-----|
| Is sound?                            | No  |
| Complies with the duty to cooperate? | No  |

#### 5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

## 6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

- 1 The road infrastructure in the area is not capable of sustaining an additional housing development.
- a)The only A road, the A57 is already congested, particularly at the Rainhill Rd/Warrington bridge.
- b) The local B roads, Rainhill Road and Portico Lane are both already at full capacity
- c) There would be an impact on the minor residential roads in the area due to the congestion on the A and B roads.
- 2. The additional traffic due to the extra houses will have adverse health and safety implications
- a) Increased risk to motorists and pedestrians including children from traffic accidents
- b) increased risk to health of pedestrians including children due to traffic pollution
- 3. Local infrastructure and amenities including schools, hospital, A & E, doctors and dentists are already stretched
- 4. There are negative impacts on the environment
- a) Replacing green belt with a built up area will increase the risk of flooding in the area, particularly for houses near the existing brook
- b) Many species of plant and animal life would be eliminated from the area
- 5) It is not clear that there is a demand for the additional houses proposed

- 6) I understand that the St Helens brownfield register suggests there is availability for 5808 houses which should reduce the requirement for green belt to be eliminated.
- 7) In view of the national obesity crisis affecting both children and adults it is important that as many sports and recreational facilities as possible are retained, and if the green belt remains it can be used for either golf or walking.

### 7. Please set out modification(s) you consider are necessary

The Council should abide with the National Policy Framework (2019) and delete this land from the proposed removal from the greenbelt

The Council should not remove the land from greenbelt to place in safeguarded.

Before any decision is taken to remove the land from greenbelt, a full study on the impact of additional housing on traffic and local infrastructure and amenities should be undertaken including all the health, safety and environmental impacts

## 8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

| Response Date | 3/19/2019 11:53:39 AM |
|---------------|-----------------------|

# RO1338

| Web Reference Number | WF0057               |
|----------------------|----------------------|
| Type of Submission   | Web submission       |
| Full Name            | Mrs Patricia O'Hagan |
| Organisation         |                      |
| Address              | 46 Forest Grove      |
|                      | Eccleston Park       |
|                      | Prescot              |
|                      | Merseyside L342RZ    |
| Agent Details        |                      |

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

### 3. To which part of the Local Plan does this representation relate?

| Policy                               | LPA06 |
|--------------------------------------|-------|
| Paragraph / diagram / table          | 3HS   |
| Policies Map                         |       |
| Sustainability Appraisal / Strategic | YES   |
| Environmental Assessment             |       |
| Habitats Regulation Assessment       |       |
| Other documents                      |       |

#### 4. Do you consider the St Helens Borough Local Plan 2020-2035:

| Is legally compliant?                | Yes |
|--------------------------------------|-----|
| Is sound?                            | No  |
| Complies with the duty to cooperate? | No  |

#### 5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

## 6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

- 1 The road infrastructure in the area is not capable of sustaining an additional housing development.
- a) The only A road, the A57 is already congested, particularly at the Rainhill Rd/Warrington bridge.
- b) The local B roads, Rainhill Road and Portico Lane are both already at full capacity
- c) There would be an impact on the minor residential roads in the area due to the congestion on the A and B roads.
- 2. The additional traffic due to the extra houses will have adverse health and safety implications
- a) Increased risk to motorists and pedestrians including children from traffic accidents
- b) increased risk to health of pedestrians including children due to traffic pollution
- 3. Local infrastructure and amenities including schools, hospital, A & E, doctors and dentists are already stretched
- 4. There are negative impacts on the environment
- a) Replacing green belt with a built up area will increase the risk of flooding in the area, particularly for houses near the existing brook
- b) Many species of plant and animal life would be eliminated from the area
- 5) It is not clear that there is a demand for the additional houses proposed

- 6) I understand that the St Helens brownfield register suggests there is availability for 5808 houses which should reduce the requirement for green belt to be eliminated.
- 7) In view of the national obesity crisis affecting both children and adults it is important that as many sports and recreational facilities as possible are retained, and if the green belt remains it can be used for either golf or walking.

### 7. Please set out modification(s) you consider are necessary

The Council should abide with the National Policy Framework (2019) and delete this land from the proposed removal from the greenbelt

The Council should not remove the land from greenbelt to place in safeguarded.

Before any decision is taken to remove the land from greenbelt, a full study on the impact of additional housing on traffic and local infrastructure and amenities should be undertaken including all the health, safety and environmental impacts

## 8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

| Response Date | 3/13/2019 3:04:57 PM |
|---------------|----------------------|

#### **Representor Details**

| Web Reference Number | WF0058             |  |
|----------------------|--------------------|--|
| Type of Submission   | Web submission     |  |
| Full Name            | Mr Bernard O'Hagan |  |
| Organisation         |                    |  |
| Address              | 46 Forest Grove    |  |
|                      | Eccleston Park     |  |
|                      | Prescot            |  |
|                      | Merseyside L342RZ  |  |
| Agent Details        |                    |  |

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

#### 3. To which part of the Local Plan does this representation relate?

| Policy                               | LPA06 |
|--------------------------------------|-------|
| Paragraph / diagram / table          | 3HF   |
| Policies Map                         |       |
| Sustainability Appraisal / Strategic | YES   |
| Environmental Assessment             |       |
| Habitats Regulation Assessment       |       |
| Other documents                      |       |

#### 4. Do you consider the St Helens Borough Local Plan 2020-2035:

| Is legally compliant?                | Yes |
|--------------------------------------|-----|
| Is sound?                            | No  |
| Complies with the duty to cooperate? | No  |

#### 5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

### 6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

- 1 The road infrastructure in the area is not capable of sustaining an additional housing development.
- a)The only A road, the A57 is already congested, particularly at the Rainhill Rd/Warrington bridge.
- b) The local B roads, Rainhill Road and Portico Lane are both already at full capacity
- c) There would be an impact on the minor residential roads in the area due to the congestion on the A and B roads.
- 2. The additional traffic due to the extra houses will have adverse health and safety implications
- a) Increased risk to motorists and pedestrians including children from traffic accidents
- b) increased risk to health of pedestrians including children due to traffic pollution
- 3. Local infrastructure and amenities including schools, hospital, A & E, doctors and dentists are already stretched
- 4. There are negative impacts on the environment
- a) Replacing green belt with a built up area will increase the risk of flooding in the area, particularly for houses near the existing brook
- b) Many species of plant and animal life would be eliminated from the area
- 5) It is not clear that there is a demand for the additional houses proposed

- 6) I understand that the St Helens brownfield register suggests there is availability for 5808 houses which should reduce the requirement for green belt to be eliminated.
- 7) In view of the national obesity crisis affecting both children and adults it is important that as many sports and recreational facilities as possible are retained and if the green belt remains it can be used for either golf or walking.

### 7. Please set out modification(s) you consider are necessary

The Council should abide with the National Policy Framework (2019) and delete this land from the proposed removal from the greenbelt

The Council should not remove the land from greenbelt to place in safeguarded.

Before any decision is taken to remove the land from greenbelt, a full study on the impact of additional housing on traffic and local infrastructure and amenities should be undertaken including all the health, safety and environmental impacts

### 8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

| Response Date | 3/13/2019 2:51:36 PM |
|---------------|----------------------|

SITES 4HA, 8HA & 6HS (D-LPAOS (D-LPAOS

Representor Details

| Web Reference Number | WF0004  |
|----------------------|---|
| Type of Submission   | Web submission  |
| Full Name            | Councillor David O'Keefe  |
| Organisation         |   |
| Address              | 7 Parkside Avenue<br>Sutton Manor<br>St.Helens<br>WA9 4DT WA9 4DT |
| Agent Details        |   |

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

No

3. To which part of the Local Plan does this representation relate?

| Policy                               |  |
|--------------------------------------|--|
| Paragraph / diagram / table          |  |
| Policies Map                         |  |
| Sustainability Appraisal / Strategic |  |
| Environmental Assessment             |  |
| Habitats Regulation Assessment       | A 4 Page 19 Pa |
| Other documents                      |  |

4. Do you consider the St Helens Borough Local Plan 2020-2035:

| Is legally compliant?                | No |
|--------------------------------------|----|
| Is sound?                            | No |
| Complies with the duty to cooperate? | No |

5. If you consider the Local Plan is unsound, it because it is not:

Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

The council has not provided special circumstances to justify green belt release. There is enough brownfield Land for a minimum of 6,000 houses in the borough.

The council has opted for a policy of Green belt release first. They have neglected the opportunities afforded by brownfield sites to provide housing. This is in breach of the National Planning Policy framework Chapter 11 paragraphs 136, 137 and 138.

I want 4HA and 5HA removed from the Local Plan. Also the safeguarded site 6HS. SUGGESTED MODS

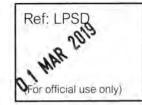
- 7. Please set out modification(s) you consider are necessary
- 8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:



# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form



Please also read the **Representation Form Guidance Note** that is available with this form, or online at: www.sthelens.gov.uk/localplan

Please ensure the form is returned to us by no later than 5pm on Wednesday 13th March 2019. Any comments received after this deadline cannot be accepted.

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

### PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

| Your Details     (we will correspond via your agent)   | 2. Your Agent's Details (if applicable)   |
|--|---|
|  | Title:  |
| First Name: lichard  | First name:   |
| Last Name: OLIVEL  | Last Name:  |
| Organisation/company:  | Organisation/company:   |
|  | Address:  |
| Postcode: GING DTA   | Postcode:   |
|  | Tel No:   |
| Mobile No:   | Mobile No:  |
| Email:   | Email:  |
| Signature:   | Date: 20 (02   19   |
| Please be aware that anonymous forms cannot l<br>considered you MUST include your details abov | be accepted and that in order for your comments to be   |
|  | tages of the St Helens Borough Local Plan 2020-2035? publication of the Inspector's recommendations and |
| Yes (via email)  | □ No  |
| Please note - email is the Council's preferred me will contact you by your postal address.     | nethod of communication. If no email address is provided,   |

#### **RETURN DETAILS**

Please return your completed form to us by no later than 5pm on Wednesday 13th March 2019 by:

post to:

Local Plan

St. Helens Council

Town Hall

Victoria Square

St Helens WA10 1HP

or by hand delivery to:

Ground Floor Reception

St. Helens Town Hall

(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

#### FURTHER INFORMATION

If you require further information please see the FAQs on our website: www.sthelens.gov.uk/localplan

If you still need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk

Telephone: 01744 676190

#### **NEXT STEPS**

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

### DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: www.sthelens.gov.uk/localplan

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

# Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

### **PART B - YOUR REPRESENTATION**

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

|   | as Borough Local e for explanations o         | Sustainability Appraisal/ Strategic Environmental Assessment  Plan 2020-2035 is: If Legal Compliance a  Yes  Yes  N  Yes  N  Yes   | and the Tests of Soundness   |
|---|---|--|--|
| er the St Helen<br>Guidance note<br>?<br>Duty to Cooper | as Borough Local e for explanations o         | f Legal Compliance a   | lo   |
| er the St Helen<br>Guidance note<br>?<br>Duty to Cooper | as Borough Local e for explanations o         | f Legal Compliance a   | lo   |
| Guidance note ?  Duty to Cooper                         | e for explanations o                          | f Legal Compliance a   | lo   |
| ?<br>Duty to Cooper                                     | <b>V</b>                                      | Yes N  | lo   |
| Duty to Cooper  | rate  |  |  |
|   | rate  | res v  | 10   |
|   | rate  | Van  |  |
| ropriate  |   | Yes N  | 10   |
|   |   |  |  |
| d? ational Policy?                                      |   |  |  |
| ply with the du   | ity to cooperate. <u>F</u>                    | Please be as precise   | as possible.   |
| set out your c  | comments.                                     |  |  |
| purposes<br>n by end<br>land -                          | couraging the<br>couraging the<br>thing green | reabelt is<br>e recycling<br>belt fails<br>Il cause sig  | to assist in unto<br>of derelict and<br>to do this<br>improant horn to |
|   | estruction by en land -                       | oly with the duty to cooperate. Fupport the legal compliance or set out your comments.  I - The council should estimated - purposes of the green by encouraging the land - thing green are of greenself with the same and the same | 1 - The council should be put to                                       |

Please continue on a separate sheet if necessary

| compliant or sound, having regard to the marelates to soundness (NB please note that a incapable of modification at examination). It the Local Plan legally compliant or sound. It suggested revised wording of any policy or | ny non-complia<br>ou will need to<br>will be helpful<br>text. Please be | nce with the duty say why this modi if you are able to pass precise as poss | to cooperate is<br>fication will make<br>out forward your<br>sible |
|---|---|---|--|
| Delete this land from the the greenbelt.  | · prope   | sed remove  | I from   |
|   |   | Please continue on a si   | eparate sheet if necessar  |
| lease note: your representation should cover suc<br>formation necessary to support/justify the repres<br>ill not normally be a subsequent opportunity to m  | entation and sug  | gested modification   | n, as there  |

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)



No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.



### St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form



Please also read the Representation Form Guidance Note that is available with this form, or online at: www.sthelens.gov.uk/localplan

Please ensure the form is returned to us by no later than 5pm on Wednesday 13th March 2019. Any comments received after this deadline cannot be accepted.

This form has two parts;

1. Your Details

Part A - Personal Details

Part B - Your Representation(s)

2. Your Agent's Details (if applicable)

### PART A - YOUR DETAILS

(we will correspond via your agent)

Please note that you must complete Parts A and B of this form.

1 view at http://www.legislation.gov.uk/ukpga/2004/5/contents

| First Name: Lichard  | First name:  |
|--|--|
| Last Name: CLIVEL  | Last Name:   |
|  | Organisation/company:  |
| Address: 33 ULCTORIA ROAD  | Address:   |
|  | Postcode:  |
| Tel No:  | Tel No:  |
| Mobile   | Mobile No:   |
| Email:   | Email:   |
| Signature:   | Date: 28/82/19   |
| Please be aware that anonymous forms cannot considered you MUST include your details above                                 | be accepted and that in order for your comments to be ye.  |
| Would you like to be kept updated of future so<br>(namely submission of the Plan for examination,<br>adoption of the Plan) | stages of the St Helens Borough Local Plan 2020-2035? , publication of the Inspector's recommendations and |
| Yes (via email)  | ☐ No   |
| Please note - email is the Council's preferred me will contact you by your postal address.                                 | nethod of communication. If no email address is provided,  |

### **RETURN DETAILS**

Please return your completed form to us by no later than 5pm on Wednesday 13th March 2019 by:

post to: Local Plan

St. Helens Council

Town Hall Victoria Square St Helens WA10 1HP

or by hand delivery to: Ground Floor Reception

St. Helens Town Hall

(open Monday-Friday 8.30am - 5.15pm)

or by email to: planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

### **FURTHER INFORMATION**

If you require further information please see the FAQs on our website; www.sthelens.gov.uk/localplan

If you still need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk

Telephone: 01744 676190

#### **NEXT STEPS**

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

### DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: www.sthelens.gov.uk/localplan

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

# Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

### **PART B - YOUR REPRESENTATION**

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

| 3. To which             | part of the Local Pla  | an does this repre                            | sentation relate?   |   |
|-------------------------|--|---|---|---|
| Policy<br>_PACS<br>I HA | Paragraph/<br>diagram<br>table   | Policies<br>Map                               | Sustainability Appraisal/ Strategic Environmental Assessment  | Habitats<br>Regulations<br>Assessment                   |
|                         | nents (please name<br>nd relevant part/secti   | on)   |   |   |
|                         | onsider the St Helen   |   | Plan 2020-2035 is:<br>f Legal Compliance and th   | na Tasts of Soundness                                   |
| Legally Com             | STAN AND   | rior explanations o                           | Yes No  | ie lests of Soundhess                                   |
| Sound?                  | pliant:  |   | Yes No  |   |
|                         | th the Duty to Coope   | rate $\square$                                | Yes No  |   |
|                         | 2012 2 2 2 2 2 2 2 2 2 1 2 2 1 1 2 1 1 2 1 1 2 1 1 2 1 1 2 1 1 2 1 1 2 1 1 2 1 1 2 1 1 2 1 1 2 1 1 2 1 1 2 1 1 1 2 1 1 1 2 1 |   |   |   |
| Please tick a           | as appropriate   |   |   |   |
| Please rea              |  |   | because it is not:<br>f the Tests of Soundness  |   |
| Positively Pre          | epared?  |   |   |   |
| Justified?              |  | $\square$                                     |   |   |
| Effective?              |  |   | /   |   |
| Consistent w            | vith National Policy?  | $\nabla$                                      |   |   |
| or fails to             | comply with the du   | ty to cooperate. <u>F</u><br>al compliance or | cal Plan is <u>not legally co</u><br>lease be as precise as possible of the Local I   | ossible.  |
| Not justif              | estimates. The country the purposes of de  | population of                                 | A Helens has been of from? to assist in with les when land. It  | in declare since on regeneration by sing areenself for  |
|                         | - 1/   |   |   |   |
| the release             | ve of Geenbell   | sn't sustainers south                         | ble because of the lack of faction bullinge Road or highway to the control of the lack of | the lack of solve ites. The use of lives. Carryood Road |

| Delete His land from<br>from the greenbett   | te proposed removed   |
|--|---|
| asa note: vous representation should cover   | Please continue on a separate sheet if neces  |
| rmation necessary to support/justify the repr  | succinctly all the information, evidence and supporting resentation and suggested modification, as there make further representations based on the original   |
| rmation necessary to support/justify the representation at the publication stage.  For this stage, further submissions will be a lissues he/she identifies for examination.  If your representation is seeking a modification necessary to support the publication of the publication is seeking a modification. | resentation and suggested modification, as there is make further representations based on the original conly at the request of the Inspector, based on matter cation; do you consider it necessary to participate a |
| rmation necessary to support/justify the reprinct normally be a subsequent opportunity to resentation at the publication stage.  For this stage, further submissions will be only in the control of the stage.  It issues he/she identifies for examination.   | resentation and suggested modification, as there is make further representations based on the original conly at the request of the Inspector, based on matter cation; do you consider it necessary to participate a |

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.



### St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

2 8 FEB 2019

(For official use only)

Please also read the Representation Form Guidance Note that is available with this form, or online at: www.sthelens.gov.uk/localplan

Please ensure the form is returned to us by no later than 5pm on Wednesday 13th March 2019. Any comments received after this deadline cannot be accepted.

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

### PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

| 1. Your Details                                | 2. Your Agent's Details (if applicable) |
|--|---|
| (we will correspond via your agent)  Title: MR | Title:                                  |
| First Name MARTIN NEWMAN                       | First name:                             |
| Last Name: DLLEY                               | Last Name:                              |
| Organisation/company:                          | Organisation/company:                   |
|  | Address:                                |
| Postcode: WAII OUG Tel No: Mobile No: Email:   | Postcode:  Tel No:  Mobile No:          |
| Signature:                                     | Date: 26.2.2019                         |

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you MUST include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via email)

Please note - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

VICT. U.

### **RETURN DETAILS**

Please return your completed form to us by no later than 5pm on Wednesday 13th March 2019 by:

post to:

Local Plan

St. Helens Council

Town Hall

Victoria Square

St Helens

WA10 1HP

or by hand delivery to:

Ground Floor Reception St. Helens Town Hall

(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

### **FURTHER INFORMATION**

If you require further information please see the FAQs on our website: www.sthelens.gov.uk/localplan

If you still need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk

Telephone: 01744 676190

### **NEXT STEPS**

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

### DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: www.sthelens.gov.uk/localplan

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

### PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

| Policy                                 | Paragraph/<br>diagram<br>table   |                    | Policies<br>Map                 | Sustainability Appraisal/ Strategic Environmental Assessment  | Habitats<br>Regulations<br>Assessment   |
|--|--|--------------------|---------------------------------|---|---|
|  | uments (please nan<br>and relevant part/s  |                    |                                 | 4   |   |
|  | consider the St He<br>ead the Guidance r   |                    |                                 | Plan 2020-2035 is:<br>Legal Compliance and  | the Tests of Soundness  |
| Legally Co                             | mpliant?   |                    |                                 | Yes No  |   |
| Sound?                                 |  |                    |                                 | Yes Mo  |   |
| Complies                               | with the Duty to Coo   | operate            |                                 | Yes No  |   |
| Please tick                            | as appropriate   |                    |                                 |   |   |
| Justified?<br>Effective?<br>Consistent | t with National Polic  | y?                 |                                 |   |   |
| or fails                               | to comply with the ish to support the box to set out you have read to the trust form the thrustone target and the trustone tar | legal commerce (6+ | DANCE NOTES  AND KAND  MY LIFE. | lease be as precise as soundness of the Local  AND FAQS AND THE NEVER READ SO ME I WROTE TO THE COME  TIONS TO THE PROPOSAL | Plan, please also  THE SECTIONS  WICK LEGAL AND  WILL ON S FER  L FOR ROWING-IN |
| ) Ko                                   | MU APP YET IND   | T ON               | FROM THE A                      |   | / ' '   |

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible. WILD LIFE ( "ROOM TO BREATHE." WHERE IS ALL THIS BUILDING GOING TO ENX? MY MAIN OBJECTION IS THE LOSS OF SO MUCH OPENSIACE IN SUCK & Short PERIOD ON TIME - DON'T FORGET THE HUGE WALEROUSES YOU KIVE BLANDLY AGREED TO IN AREAS EAZ/ EAG/ EA7 WHICH WILL BLIGHT THOUSANDS OF PEOPLE'S LIVES FOR EVER. PLEASE READ THIS IN CONTUNCTION WITH MY LETTER SK & FEGLUARY -ASSUMING YOU WHUE NOT ALREADY BINNED IT. Please continue on a separate sheet if necessary Please note: your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage. After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination. 8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public) No, I do not wish to participate Yes, I wish to participate at the oral at the oral examination examination If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

FROM: MARTIN N.OLLEY
19 VICARAGE DRIVE
HAYDOCK
WA11 OUG



5th.FEBRUARY 2019

TO : LOCAL PLAN
ST HELENS COUNCIL

DEAR SIRS,

YOUR REF: NXM325A

I HAVE RECEIVED YOUR LETTERS DATED 15th. & 16th. JANUARY CONCERNING GREEN BELT UNDER REF. 2HA TO THE NORTH OF MY AVENUE.

### TWO QUESTIONS TO START WITH :

- 1. WHY DID YOU SEND TWO VIRTUALLY IDENTICAL LETTERS ON CONSECUTIVE DATES WHY COULD ALL THE INFORMATION NOT BE CONTAINED IN THE FIRST LETTER? IF YOU DID THIS WITH ALL THE PEOPLE YOU SENT LETTERS TO, IT HAS INVOLVED A LOT OF EXTRA COST AND ADMIN. WORK. ANSWER: COUNCIL INCOMPETENCE. STILL, ITS ONLY OUR MONEY ISN'T IT?
- 2. I NOTICE THAT AREA REF. 2EA IS STILL SHOWN AS GREEN BELT, BEFORE YOU PUBLISH THE PLAN FOR 2020-2035, BUT IT ALREADY HAS TWO BLOODY GREAT WAREHOUSES BEING BUILT ON IT, DESPITE THE OBJECTIONS OF HUNDREDS OF PEOPLE.I KNOW THAT THIS DEVELOPMENT HAD ALREADY BEEN AGREED PRIOR TO THE CHARADE OF PUBLIC MEETINGS AT THE TOWN HALL IN 2016.AT THE TOWN HALL MEETING THE MEMBERS OF THE PLANNING COMMITTEE SAT FACING US, LOOKING LIKE BUTTER WOULDN'T MELT IN THEIR MOUTHS WHILST THE FARCE OF "HEARING PEOPLES' VIEWS" UNFOLDED.WHY CAN'T YOU JUST BE HONEST WITH PEOPLE AND TELL US THAT YOU WILL DO AS YOU LIKE ANYWAY.OUR VIEWS AND OPINIONS OBVIOUSLY COUNT FOR NOTHING?

AND AM ASTOUNDED AT THE SHEER SCALE OF HOUSE BUILDING GOING ON.I AM ALSO ASTOUNDED BY THE LARGE AREAS OF LITTER-STREWN AND FENCED-OFF LAND IN THE BOROUGH, PARTICULARLY AROUND PARR, SUTTON & ST HELENS JUNCTION, ALL OF IT EX-BROWN FIELD SITES.AT THIS STAGE IT IS INCOMPREHENSIBLE TO ME (AND REPREHENSIBLE) THAT YOU ARE EVEN CONTEMPLATING RIPPING UP YET MORE VERY VALUABLE AND IRREPLACEABLE GREEN BELT.ALSO BEAR IN MIND THAT FOR EACH NEW HOUSE BUILT YOU CAN COUNT ON TWO MORE CARS/VANS TO ADD YET MORE CONGESTION ON ROADS WHICH ARE BARELY COPING AT THE MOMENT.TO SAY NOTHING ABOUT THE NOISE AND POLLUTION - AND THAT IS BEFORE THE HORRENDOUS AMOUNT OF TRAFFIC TO COME WHEN THE NEW WAREHOUSES ARE UP AND RUNNING.THE COUNCIL DOESN'T SEEM TO GIVE A TOSS FOR EXISTING RESIDENTS' QUALITY OF LIFE, OR THEIR ABILITY TO SIMPLY GET FROM A TO B.

A FURTHER QUESTION.WHAT IS GOING ON AT THE EAST LANCS ROAD/PEWFALL JUNCTION, WITH CONES REGULARLY REDUCING EACH CARRIAGEWAY TO ONE LANE, THEREBY CREATING LONG TRAFFIC JAMS? A WORD WITH ONE OF THE "WORKERS" (I USE THE TERM VERY LOOSELY!) ELICITED THE INFORMATION THAT THEY ARE SURVEYING (WASN'T MUCH SIGN OF ANY WORK BEING DONE) PRIOR TO THE JUNCTION BEING REDESIGNED.NOW WHY WOULD THAT BE, I WONDER? MY GUESS IS THAT YOU

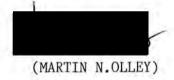
HAVE ALREADY AGREED FOR THE RELEASE OF AREA 2HA FOR HOUSE BUILDING BEFORE PERUSAL OF THE 2020-2035 PLAN, AND BEFORE ANY PUBLIC CONSULTATION. I WOULD BE DELIGHTED IF YOU WERE TO TELL ME I HAD GOT IT WRONG. YOU REALLY ARE A DEVIOUS BUNCH.

WHEN THAT AREA IS RELEASED (AND I AM SURE IT WILL BE, DESPITE WHAT LOCAL RESIDENTS THINK), THEN I HOPE THE HOUSE BUILDING IS DONE SYMPATHETICALLY AS THE CLIPSLEY BROOK AND VALLEY IS A HAVEN FOR WILD LIFE AND BIRDS.

FINALLY, A REQUEST. THE WASTE LAND OPPOSITE THE HOUSES ON BROOKSIDE VIEW IS DISGUSTING, WITH YEARS OF LITTER (TIN CANS & PLASTIC BOTTLES) MAKING THE WHOLE AVENUE VERY UNTIDY. I REFER PARTICULARLY TO THE LAND (THE PARTS WHICH DON'T HAVE GARAGES BUILT ON THEM) AT THE WEST END FROM THE TOP OF GROSVENOR ROAD. I WOULD LIKE THE COUNCIL TO ARRANGE TO HAVE IT CLEANED UP PLEASE. IF THE COUNCIL SAYS IT DOESN'T KNOW WHO THE LAND BELONGS TO, THEN PLEASE FIND OUT OR WRITE TO THE RESIDENTS OPPOSITE ABOUT THE PROBLEM. YOU HAVE ONE MONTH TO SEE TO IT, FAILING WHICH I WILL TEMPORARILY WITHOLD MY COUNCIL TAX UNTIL IT IS DONE. PLEASE SAVE US ALL A LOT OF HASSLE, AND JUST DO IT. I RECKON THE ROAD SWEEPER COULD ACCOMPLISH THE TASK IN LESS THAN HALF AN HOUR. (INCIDENTALLY, I HAVE NOT SEEN A ROAD SWEEPER DOWN VICARAGE DRIVE FOR MANY A LONG DAY - JUST WHAT AM I PAYING MY COUNCIL TAX FOR?) IT GOES WITHOUT SAYING THAT MY NAME & ADDRESS ISN'T MENTIONED TO ANYONE.

I KNOW THAT THE COUNCIL DOESN'T USUALLY TROUBLE ITSELF TO REPLY TO ANY CORRESPONDENCE, BUT I DO EXPECT A REPLY TO THIS LETTER, AND TO SOME OF THE POINTS RAISED.

YOURS FAITHFULLY,



### P.S. RE THE "REGENERATION" OF THE TOWN CENTRE.

I AM AFRAID IT IS TOO LATE. THE DAMAGE THIS GOD DAMN AWFUL COUNCIL HAS DONE TO THE TOWN STARTED WAY BACK IN THE 1970s WITH THE DISASTROUS AND ILL THOUGHT-OUT RE-DEVELOPMENT, WHEN THE OLD MARKET AND MARKET SQUARE WAS DEMOLISHED. YES, IT DID LOOK A BIT TIRED, BUT IT COULD HAVE BEEN SMARTENED UP AND RETAINED AS A FOCAL POINT IN THE TOWN. SINCE THEN YOU HAVE ALLOWED THE DEMOLITION OF THE TWO BEST BUILDINGS IN TOWN (THE FLEECE HOTEL AND THE CO-OP BUILDING), AND REPLACED BY UGLY "MODERN" BUILDINGS, MOST OF WHICH ARE NOW EMPTY! WOOLWORTHS, M & S(SOON), ARGOS, W H SMITH, BURTONS, ETC. ETC. HAVE GONE, SOME TO THE DISASTROUS "RETAIL PARK" AT RAVENHEAD, THUS CREATING MORE & MORE HORRENDOUS TRAFFIC, IN AN AREA WHERE THERE IS LITTLE, IF ANY, PUBLIC TRANSPORT. ALL THOSE STORES SHOULD HAVE STAYED IN TOWN (TO WHERE THERE IS PUBLIC TRANSPORT) TO KEEP IT VIBRANT, AND THE LARGE "RETAIL PARK" AREA SHOULD HAVE BEEN FILLED WITH HOUSES - WHICH IS WHAT YOU KEEP TELLING US WE NEED MORE OF! ALL TOO LATE NOW, I'M AFRAID. THE DAMAGE HAS BEEN DONE AND THERE IS NO GOING BACK. AND ST HELENS IS BY NO MEANS THE ONLY TOWN REDUCED TO A SHELL BY THE CALAMITOUS TOWN & COUNTRY PLANNING DECISIONS OF THE LAST 30-35 YEARS. SO FOR GOD'S SAKE DON'T WASTE MORE MILLIONS REPLACING OLD EMPTY SHOPS WITH NEW EMPTY SHOPS!

0-LPAOS 2-10P

1 2 MAR 2019

Miss Caroline O'Neile 72 Norley Drive Eccleston St Helens WA10 5NJ

10th March 2019

Reference: St Helens Local Plan 2020-2035

Dear Sir/Madam,

This representation presents my concerns with the latest version of the St Helens Metropolitan Borough Council (StHMBC) Local Plan 2020-2035, as it contains some questionable elements and does not seem to be justified or consistent with National Policy. My primary concern is for the area designated 8HS, though the following points will apply to most areas within the Local Plan.

Firstly, LPA05 Meeting Housing Need.

- Growth numbers are aspirational and not realistic, using older 2014 Office for National Statistics (ONS) figures rather than the latest 2016 ONS figures for growth.
- StHMBC's Brownfield Register suggests land availability for some 5800 houses, whilst Table 4.6 of the Plan calls for about 7200, leaving a need of about 1400 houses. This equates to about 48Ha of land rather than the proposed 288Ha.
- StHMBC states it needs to safeguard land to plan for beyond this 15 year Local Plan, beyond 2035 when so much can change in that timeframe. It seems unnecessary and irresponsible to remove Green Belt protection from land before the end of this proposed Plan, as it might never be required.
- The Plan makes little or no use of Brownfield or Previously Developed Land. StHMBC states 3170Ha of the lowest priority contaminated land exists in the borough which could be remediated and brought back into use. It is unreasonable to assume that such land cannot be made available within the 15 year Plan period. The removal of 443Ha from Green Belt protection when over 3000Ha of Brownfield land exists is not logical and there does not appear to be any exceptional circumstances to justify the removal of Green Belt on this scale.
- The Plan in its current form cannot be justified or deemed to be effective and therefore can't be considered sound.

Secondly, LPA08 Infrastructure Delivery Plan (IDP).

- The IDP attempts to address some very aspirational and questionable growth forecasts but seems to lack any detailed substance on what will actually be done to solve the issues that adoption of this Plan will undoubtedly bring.
- The plan proposes unsustainable traffic growth, which will cause severe traffic
  issues in the exact areas that the Borough already has significant and intractable
  problems today. This cannot satisfy the NPPF. Whilst the IDP refers to some of
  these existing issues but it does not detail how these problems will be solved or
  even funded, with many references to "seeking contributions" and numerous
  TBCs.



- The IDP does not clearly address Education needs; how these will be funded or managed. Mention is made of expansion plans for one Primary School but that is for current pupil placement issues and doesn't address school places that will be required for over 1000 new homes at site 8HS. The IDP does not deal with the long term impacts of the education needs of new and existing communities.
- Similarly, the IDP does not clearly address Healthcare. Whilst the IDP
  acknowledges that a high proportion of existing GPs are over 55 and attracting
  new GPs is a problem, the proposed population increase would require 10-16
  new GP's plus replacements for those approaching retirement. The Plan does
  not elaborate on how these will be funded and provided.
- With the removal of Green Belt land, there will be an irrevocable loss of Grade 1
   agricultural farm land, at a time when there may be potential issues of food
   availability in the short-medium term. The Sustainability Appraisal document
   even promotes the loss of this Grade 1 agricultural land so as to provide local
   employment to a new residential development!

employment to a new residential development!

Taking all of the above cumulatively, the Local Plan in its current form when examined by the Planning Inspector cannot be considered to be justified, effective, consistent with National policy or positively prepared. As a consequence it must

Yours Sincerely,

surely follow that it cannot be considered sound.

Ms C. O'Neile





3 Ecclesfield Road Eccleston St Helens WA10 5LU

9th March 2019

Reference: St Helens Local Plan 2020-2035

Dear Sir/Madam,

I am writing to object to the St Helens Council Local Plan (2018). In particular, I am objecting to the decisions made regarding Housing Need (LPA05) and the Greenbelt Review (2018).

St Helens Council are using a projected annual house building target of 486, based on the ONS (2014) suggestion of 468 but the later, more accurate ONS estimate is 383. The St Helens adopted target appears to be incorrect and unexplainable. The justification for the Greenbelt Review (2018) is this erroneous target and is being used by St Helens Council as the reason for "exceptional circumstances" in removing key areas from the Green Belt. I do not consider an over-ambitious and aspirational housing target to be "exceptional circumstances".

The need to maintain healthy eco-systems in the UK puts a higher economic value on Green Belt and agricultural land. Much more so than using that land for housing and related development. It is very difficult to identify any special circumstances that outweigh the need to protect Green Belt and agricultural land.

According to the UN (2012) climate change will depress agricultural yields by 15 to 50% in most countries by 2050 whilst agricultural land lost to land degradation is estimated at 12M hectares pa; enough to produce up to 20M tonnes of grain. Furthermore, the overall trend of steadily declining agricultural yields will be subject to widely fluctuating yields in the UK and worldwide due to the growing incidence of extreme weather events, such as storms, floods and heatwaves. For example, total UK cereal production had significant dips in 2001, 2007, 2012 and 2013 linked to adverse weather conditions in those years (Defra, 2015).

Food security is an economic, social and environmental issue. It is about consumers having access at all times to sufficient, safe and nutritious food for an active and healthy life at affordable prices. To achieve this, our food supply must be reliable and resilient to shocks and crises. Food must also be produced in a way that is environmentally sustainable or we will be storing up problems for the medium to long term.

Protecting food security has to run in parallel with other priorities such as tackling climate and securing a healthy natural environment. These collectively are likely to

be the most pressing economic and social factors affecting the UK in the 21st Century. The question is not IF food security will become a serious issue but WHEN.

The loss of any greenbelt should not be taken lightly. I can only comment on one area of greenbelt mentioned in the local plan as this is the only one that I use. The land parcel referred to as 8HS, south of the A580 adjacent to Windle Island. This land is grade 1 and 2 agricultural land and has been farmed since the 1850's. It is also land that is enjoyed regularly by the residents who use the numerous footpaths.

If this valuable farming land is removed from Green Belt, the nearest green space would then be north of the A580 and people would be trying to cross this road to access open countryside. This is already a very busy road and as part of the Borough's strategy will get even busier. As the figures taken from the Mott MacDonald business case for the Windle Island Improvement plan show:-

"Following consultation with a transport modeler, junction improvements at the Windle Island junction are not predicted to trigger the criteria which relate to traffic flow or speeds changes in DMRB: (Design Manual for Roads and Bridges). Daily Traffic flows will change by 1000 AADT (Average Annual Daily Traffic) or more;

Heavy Duty Vehicle (HDV) flows will change by 200 AADT or more; Daily average speed will change by 10km/hr or more; and Peak hour speed will change by 20km/hr or more."

Contaminated brown field sites have not been considered for development even though St Helens Council has identified 3,170 hectares of the lowest priority contaminated land but have not proposed a strategy for implementing this. In developing housing in the past, remediation has been required (examples include the former Providence Hospital site, the Cansfield Street laundry site, Triplex works and the Shires housing development). This has not been seriously considered and, again, shows that there are no "exceptional circumstances" for Green Belt release.

Careful reading of the local plan suggests that the release of greenbelt is so that development costs would be reduced thus enabling the affordable housing target to be achieved. Hardly meeting the "exceptional circumstances" justification for releasing greenbelt.

For these reasons I would suggest that the Local Plan (2018) is unsound and needs to be modified. The housing target figures should be reduced; the Plan should only consider the fifteen-year target, eliminating any requirement for "safeguarded" sites and finally, the test of "exceptional circumstances" should be carefully and realistically applied to ensure that the precious local Green Belt continues to serve its purpose.

Yours Sincerely,

1-LPAOS 2-10P

1 2 MAR 2019

Mrs Patricia O'Neile 3 Ecclesfield Road Eccleston St Helens WA10 5LU



10th March 2019

Reference: St Helens Local Plan 2020-2035

Dear Sirs,

This representation presents my concerns with the latest version of the St Helens Metropolitan Borough Council (StHMBC) Local Plan 2020-2035, as it contains some questionable elements. Therefore I believe The Plan is not sound; does not seem to be justified or consistent with National Policy. Whilst my primary concern is for the area designated 8HS, the following points will apply to most areas within the Local Plan.

Firstly, LPA05 Meeting Housing Need. The proposed growth numbers appear to be very aspirational and not on a realistic basis, as well as not using the latest 2016 Office for National Statistics (ONS) figures for growth. The use of older 2014 ONS figures suggests StHMBC preferred to use the higher numbers to suit their desire to remove Green Belt land.

StHMBC's own Brownfield Register suggests land availability for some 5800 houses, whilst Table 4.6 of the Plan shows a requirement of about 7200, thereby needing about 1400 houses. This would equate to about 48Ha of land being needed, as opposed to the Table 4.5 proposal of 288Ha of land! Five times as much.

Furthermore, StHMBC states it needs to safeguard land to plan for beyond this 15 year Local Plan, beyond 2035 when so much can change in that timeframe. It seems unnecessary and irresponsible to remove Green Belt protection from land before the end of this proposed Plan, as it might never be required.

The Plan makes little or no mention of Brownfield or Previously Developed Land that is not (yet) available or included in the register. StHMBC's own statement indicates 3170Ha of the lowest priority contaminated land exists in the borough which could be remediated and brought back into use. It seems that StHMBC has no policy and no desire to bring these sites back into use, yet it is also unreasonable to assume that such land cannot be made available within the 15 year Plan period. To propose the removal of 443Ha from Green Belt protection when over 3000Ha of Brownfield land exists is not logical and there does not appear to be any exceptional circumstances to justify the removal of Green Belt on this scale. The Plan in its current form cannot be justified or deemed to be effective and therefore can't be considered sound.

Secondly, LPA08 Infrastructure Delivery Plan (IDP). The IDP attempts to address — some very aspirational and questionable growth forecasts but seems to lack any detailed substance on what will actually be done to solve the issues that adoption of this Plan will undoubtedly bring.



The plan proposes unsustainable traffic growth, which will cause severe traffic issues in the exact areas that the Borough already has significant and intractable problems today. This cannot satisfy the NPPF. Whilst the IDP refers to some of these existing issues but it does not detail how these problems will be solved or even funded, with many references to "seeking contributions" and numerous TBCs.

The IDP does not clearly address Education needs; how these will be funded or managed. Mention is made of expansion plans for one Primary School but that is for current pupil placement issues and doesn't address school places that will be required for over 1000 new homes at site 8HS. The IDP does not deal with the long term impacts of the education needs of new and existing communities.

Similarly, the IDP does not clearly address Healthcare. Whilst the IDP acknowledges that a high proportion of existing GPs are over 55 and attracting new GPs is a problem, the proposed population increase would require 10-16 new GP's plus replacements for those approaching retirement. The Plan does not elaborate on how these will be funded and provided.

With the removal of Green Belt land, there will be an irrevocable loss of Grade 1 agricultural farm land, at a time when there may be potential issues of food availability in the short-medium term. The Sustainability Appraisal document even promotes the loss of this Grade 1 agricultural land so as to provide local employment to a new residential development!

Taking all of the above cumulatively, the Local Plan in its current form when examined by the Planning Inspector cannot be considered to be justified, effective, consistent with National policy or positively prepared. As a consequence it must surely follow that it cannot be considered sound.

Yours Sincerely,

Mrs P. O'Neile

(2)





### St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD 0 5 MAR 2019

(For official use only)

Please also read the Representation Form Guidance Note that is available with this form, or online at: www.sthelens.gov.uk/localplan

Please ensure the form is returned to us by no later than 5pm on Wednesday 13th March 2019. Any comments received after this deadline cannot be accepted.

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

### PART A - YOUR DETAILS

we will contact you by your postal address.

Please note that you must complete Parts A and B of this form.

| 1. Your Details                                | 2. Your Agent's Details (if applicable)  |
|--|--|
| (we will correspond via your agent)            | Title:   |
| First Name: PETER                              | First name:  |
| Last Name: O'NEILL                             | Last Name:   |
| Organisation/company:                          | Organisation/company:  |
| Address: III, ALDEL HEY NO.                    | Address:   |
| Postcode: WAIO 4DW                             | Postcode:  |
|  | el No:   |
|  | 1obile No:   |
|  | mail:  |
| Signature:                                     | Date: 3 3 19   |
|  | ot be accepted and that in order for your comments to be   |
| Would you like to be kept updated of future    | e stages of the St Helens Borough Local Plan 2020-2035? on, publication of the Inspector's recommendations and |
| Yes (via email)                                | □ No   |
| Please note - email is the Council's preferred | method of communication. If no email address is provided,  |

#### RETURN DETAILS

Please return your completed form to us by no later than 5pm on Wednesday 13th March 2019 by:

post to:

Local Plan

St. Helens Council

Town Hall Victoria Square St Helens WA10 1HP

or by hand delivery to:

Ground Floor Reception

St. Helens Town Hall

(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

#### FURTHER INFORMATION

If you require further information please see the FAQs on our website: www.sthelens.gov.uk/localplan

If you still need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk

Telephone: 01744 676190

#### **NEXT STEPS**

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

#### **DATA PROTECTION**

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: www.sthelens.gov.uk/localplan

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

### PART B - YOUR REPRESENTATION

3. To which part of the Local Plan does this representation relate?

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

| Policy                           | 1405                  | Paragraph/<br>diagram<br>table            | Policies<br>Map                                 | Sustainability Appraisal/ Strategic Environmental Assessment                  | Habitats Regulations Assessment |
|----------------------------------|-----------------------|---|---|---|---------------------------------|
|                                  |                       | nts (please name<br>relevant part/section | on) Green Bet                                   | f Review 2018   |                                 |
|                                  |                       |   |   | Plan 2020-2035 is:<br>Legal Compliance and                                    | the Tests of Soundness          |
| Legally                          | Compl                 | iant?                                     |   | Yes 🗵 No  |                                 |
| Sound?                           | ?                     |   |   | Yes 🛛 No  |                                 |
| Compli                           | ies with              | the Duty to Cooper                        | rate  | Yes 🔀 No  |                                 |
| Please                           | tick as               | appropriate                               |   |   |                                 |
| Positive<br>Justifie<br>Effectiv |                       | ared?                                     | X<br>X  |   |                                 |
|                                  |                       | National Policy?                          |   |   |                                 |
| or fa                            | ils to co<br>u wish t | omply with the du                         | ty to cooperate. <u>P</u><br>al compliance or s | cal Plan is not legally c<br>lease be as precise as<br>soundness of the Local |                                 |
| n' a                             | ) tro                 | susport. Pro                              | mote inch                                       | ed for oustain ased cor usay bould develop agricultural Li                    |                                 |
|                                  | 7 10                  | od securty                                | Jynony  | ugnuttud L  | and the                         |

| the Local Plan legally compliant or sound. I<br>suggested revised wording of any policy or   |  |
|--|--|
| No mention of Brompield  | and PDL that is not yet  |
| included in Bruspeld Re  | green Reak Hell  |
| Traphe problems at Windl   | e Island which are bleck Hill  |
| Donal will be excerbate  | ed.  |
| The schools ad meluce  | I certies are already of   |
| full stretch and well not  | se all to cope with  |
| increand russes  | Please continue on a separate sheet if necessary   |
| After this stage further submissions will be an  | ly at the request of the Inspector based on matters  |
| and issues he/she identifies for examination.  | ly at the request of the Inspector, based on matters attion; do you consider it necessary to participate at ngs in public) |
| and issues he/she identifies for examination.  8. If your representation is seeking a modifica   | ntion; do you consider it necessary to participate at  |
| 8. If your representation is seeking a modificathe oral part of the examination? (the hearing No, I do not wish to participate at the oral examination | ation; do you consider it necessary to participate at ngs in public)  Yes, I wish to participate at the oral               |

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.





## St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

0 5 MAR 2019

(For official use only)

Please also read the Representation Form Guidance Note that is available with this form, or online at: www.sthelens.gov.uk/localplan

Please ensure the form is returned to us by no later than 5pm on Wednesday 13th March 2019. Any comments received after this deadline cannot be accepted.

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

### PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

| 1. Your Details (we will correspond via your agent)  | 2. Your Agent's Details (if applicable)  |  |  |  |
|--|--|--|--|--|
|  | Title:   |  |  |  |
| First Name: CHRISTINE  | First name:  |  |  |  |
|  | Last Name:   |  |  |  |
| Organisation/company:  | Organisation/company:  |  |  |  |
| 3311111.   | Address:   |  |  |  |
| ECCLESTON  |  |  |  |  |
| ST HELENS  |  |  |  |  |
| Postcode: WAO HOW  | Postcode:  |  |  |  |
|  | Tel No:  |  |  |  |
|  | Mobile No:   |  |  |  |
|  | Email:   |  |  |  |
| Signature:   | Date: 4 3 2018   |  |  |  |
| Please be aware that anonymous forms canno considered you MUST include your details about                        | t be accepted and that in order for your comments to be ove.   |  |  |  |
| Would you like to be kept updated of future (namely submission of the Plan for examination adoption of the Plan) | stages of the St Helens Borough Local Plan 2020-2035?  n, publication of the Inspector's recommendations and |  |  |  |
| Yes (via email)  | □ No   |  |  |  |
| Please note - email is the Council's preferred we will contact you by your postal address.                       | method of communication. If no email address is provided,  |  |  |  |

#### RETURN DETAILS

Please return your completed form to us by no later than 5pm on Wednesday 13th March 2019 by:

post to:

Local Plan St.Helens Council

Town Hall

Victoria Square

St Helens WA10 1HP

or by hand delivery to:

Ground Floor Reception

St. Helens Town Hall

(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

#### **FURTHER INFORMATION**

If you require further information please see the FAQs on our website: www.sthelens.gov.uk/localplan

If you still need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk

Telephone: 01744 676190

#### **NEXT STEPS**

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

### DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: www.sthelens.gov.uk/localplan

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

### PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

| 3. To w  | hich par                 | t of the Local Pla                      | an does this repre                            | esentation relate?   |                                       |
|----------|--------------------------|---|---|--|---------------------------------------|
| Policy   | LA05                     | Paragraph/<br>diagram<br>table          | Policies<br>Map                               | Sustainability Appraisal/ Strategic Environmental Assessment   | Habitats<br>Regulations<br>Assessment |
|          |                          | its (please name<br>relevant part/secti | on) Green                                     | Belt Reinew 2  | 2018                                  |
|          |                          |   |   | Plan 2020-2035 is:<br>f Legal Compliance and   | the Tests of Soundness                |
| Legally  | y Complia                | ant?                                    |   | Yes 🛛 No   |                                       |
| Sound    | ?                        |   |   | Yes 🛛 No   |                                       |
| Compl    | ies with t               | he Duty to Cooper                       | rate  | Yes 🛛 No   |                                       |
| Please   | tick as a                | ppropriate                              |   |  |                                       |
| Plea     |                          | he Guidance note                        | for explanations of                           | t because it is not: If the Tests of Soundness   |                                       |
| Justifie |                          | area:                                   | $\boxtimes$                                   |  |                                       |
| Effectiv |                          |   | X   |  |                                       |
|          |                          | National Policy?                        |   | not compliant in   | th NPPF 2018                          |
| or fa    | ails to co<br>ou wish to | mply with the du                        | ty to cooperate. <u>F</u><br>al compliance or | ocal Plan is <u>not legally colleges</u><br>Please be as precise as precis | possible.                             |
| -        |                          |   |   | close not sati   |                                       |
|          |                          | ing targe                               |   |  |                                       |
| c)       | tran                     | sport sys                               | Vens  |  |                                       |
| 200      |                          | •                                       |   | ality in agricu  | 141                                   |

using ONS(2014) statistics when updated ONS (2016) statistics are available.

- 7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.
- The Plan makes no mention of Brownfield and Previously Developed Land that is not yet available or included on the Brownfield Register.
- The Plan fails to explain the impact on Healthcave and Education access to possible new residents. The current situation in these two areas does not even address current demands. There is no mention as to how future expansion would be realistically managed and funded. No references to collaboration with the Education Authority, local CCG's or the Mospital Trust.

Please continue on a separate sheet if necessary

**Please note:** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)



No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

### RO1348





### St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

1 1 MAR 2019

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at <a href="https://www.sthelens.gov.uk/localplan">www.sthelens.gov.uk/localplan</a>.

Please ensure the form is returned to us by no later than <u>5pm on Wednesday 13th March</u> <u>2019</u>. Any comments received after this deadline <u>cannot</u> be accepted.

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s).

### **PART A - YOUR DETAILS**

Please note that you must complete Parts A and B of this form.

| 1. Your Details  | Your Agent's Details (if applicable)     (we will correspond via your agent) |
|--|--|
| Title: MR_S  | Title:   |
| First Name:  | First name:  |
| MARGARET   |  |
| Last Name: O'NETCL   | Last Name:   |
| Organisation/company: Resurbant of RAINface  | Organisation/company:  |
| Address: LO ROSE PLACE   | Address:   |
| RAINFERO<br>STHERENS<br>Postcode: WALL 809   |  |
| Postcode: LAU 809  | Postcode:  |
| Tel No:  | Tel No:  |
| Mobile No:   | Mobile No:   |
| Email:   | Email:   |
| Signature:   | Date: 10.3.19  |
| Please be aware that anonymous forms cannot be<br>comments to be considered you MUST include yo  | our details above.   |
| Would you like to be kept updated of future Plan 2020-2035? (namely submission of the Planspector's recommendations and adoption of the Planspector's recommendations. | an for examination, publication of the                                       |
| Yes (Via Email)  | No 🗌   |
| Please note - e-mail is the Council's preferred r<br>address is provided, we will contact you by you   |  |

### **RETURN DETAILS**

Please return your completed form to us by no later than <u>5pm on Wednesday 13<sup>th</sup> March</u> <u>2019</u> by:

post to:

Local Plan

St.Helens Council

Town Hall

Victoria Square

St.Helens Merseyside WA10 1HP

or by hand delivery to:

Ground Floor Reception, St. Helens Town Hall (open Monday-

Friday 8:30am - 5:15pm)

or by e-mail to:

planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

#### **FURTHER INFORMATION**

If you require further information please see the FAQs on our website at www.sthelens.gov.uk/localplan. If you still need assistance, you can contact us via:

Email:

planningpolicy@sthelens.gov.uk

Telephone:

01744 676190

### **NEXT STEPS**

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

### **DATA PROTECTION**

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website at www.sthelens.gov.uk/localplan.

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete <u>PART B</u> of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

### RO1349



### St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

1 1 MAR 2019

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at <a href="https://www.sthelens.gov.uk/localplan">www.sthelens.gov.uk/localplan</a>.

Please ensure the form is returned to us by no later than <u>5pm on Wednesday 13th March</u> <u>2019</u>. Any comments received after this deadline <u>cannot</u> be accepted.

This form has two parts;

Part A - Personal Details

Part B – Your Representation(s).

### PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

| 1. Your Details  | 2. Your Agent's Details (if applicable) (we will correspond via your agent) |
|--|---|
| Title: Mr.   | Title:  |
| First Name: Deremil  | First name:   |
| Last Name: O'Neu   | Last Name:  |
| Organisation/company: Resident   | Organisation/company:   |
| Address: 16 Rose place Rainford<br>ST-Releas, messensule   | Address:  |
| Postcode: WAN 809.   | Postcode:   |
| Tel No:  | Tel No:   |
| Mobile No:   | Mobile No:  |
| Email:   | Email:  |
| Signature:   | Date: 10.3.19   |
| lease be aware that anonymous forms cannot be comments to be considered you MUST include you Would you like to be kept updated of future | our details above.  |
| Plan 2020-2035? (namely submission of the Pl<br>Inspector's recommendations and adoption of the  | an for examination, publication of the                                      |
| Yes (Via Email)  | No 🗌  |
| Please note - e-mail is the Council's preferred raddress is provided, we will contact you by you   |   |

### **RETURN DETAILS**

Please return your completed form to us **by no later than <u>5pm on Wednesday 13<sup>th</sup> March</u> <u>2019</u> by:** 

post to:

Local Plan

St.Helens Council

Town Hall

Victoria Square

St.Helens Merseyside WA10 1HP

or by hand delivery to:

Ground Floor Reception, St. Helens Town Hall (open Monday-

Friday 8:30am - 5:15pm)

or by e-mail to:

planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

### FURTHER INFORMATION

If you require further information please see the FAQs on our website at <a href="https://www.sthelens.gov.uk/localplan">www.sthelens.gov.uk/localplan</a>. If you still need assistance, you can contact us via:

Email:

planningpolicy@sthelens.gov.uk

Telephone:

01744 676190

#### **NEXT STEPS**

The Council intends to submit the St. Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

#### DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website at <a href="https://www.sthelens.gov.uk/localplan">www.sthelens.gov.uk/localplan</a>.

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete <u>PART B</u> of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

Making the site waterloyged at the best of times. Flooding is a Problem with only Recently the brook bursting its banks and erroding the grand that Road at Pasture Care Causing the Road to Collapse Any invease in Surface water would invease the litely hood of this happening again, as grand that arginally socked up Rain water that arginally socked up Rockey lane is Conveted over, so run of hould increase.

- 3 local Schools are already full So no Spare Capacity in Junal, Junior and bocal Schools.
- (4) No Pork facilités et this end of the village, only thing george le Park, long abandones.
- (5) not enough Parking in the village for made People
- 6. G.P Poutres are already Jull, so spare Capanty
- The loss of land to the farmer would impart on his viability as a business and put people and of a Job not creating sobs etc. RainFord is an

agricultural village, that is its industry agrowing book for hill, aldi etc. Plans observes goes against the local (8) There is plenty of Brown field land sites that St. Helders Can bould an. To attract Burguess to ST. Nelens, the Town Needs to be fand scapped, the Town Centre devel to Make it attractive to New incoming west-nest, Senior Schools Need to be improved improved ST. Helens as is Simply unattratue and a Complete with chammaton ete on greenbelt land will not

### RO1350

EF0061



St. Helens Borough Local Plan 2020-2035 - Group Representation Adam Onyett

SITE 3H(

planningpolicy@sthelens.gov.uk 13/03/2019 10:35

2 Attachments





St Helens Local Plan - Representation Form.pdf Group Representation Signatories.pdf

Good morning

Please find our group representation, with my Lead Name, attached regarding the Local Plan.

Regards Adam Onyett



### St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at <a href="https://www.sthelens.gov.uk/localplan">www.sthelens.gov.uk/localplan</a>.

Please ensure the form is returned to us by no later than <u>5pm on Wednesday 13th March</u> <u>2019</u>. Any comments received after this deadline <u>cannot</u> be accepted.

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s).

### PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

| 1. Your Details   | <ol> <li>Your Agent's Details (if applicable)</li> <li>(we will correspond via your agent)</li> </ol> |
|---|---|
| Title: Mr   | Title:  |
| First Name: Adam  | First name:   |
| Last Name: Onyett   | Last Name:  |
| Organisation/company: N/A   | Organisation/company:   |
| Address: 37 Wedgewood Gardens<br>St Helens  | Address:  |
| Postcode: WA9 5GA   | Postcode:   |
|   | Tel No:   |
|   | Mobile No:  |
|   | Email:  |
| Signature:  | Date: 10/03/19  |
| Please be aware that anonymous forms can<br>comments to be considered you MUST incl | nnot be accepted and that in order for your ude your details above.                                   |

|                                    | of future stages of the St Helens Borough Local   |
|------------------------------------|---|
| Plan 2020-2035? (namely submission | n of the Plan for examination, publication of the |
| Inspector's recommendations and ad |   |
| Yes 🛛 (Via Email)                  | No 🗌  |
|                                    | No  |

# Please use a separate copy of Part B for each separate comment/representation.

### PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

| 3. To w | hich part | of the Local I                    | Plan doe | es this repre   | esentation relate?   |   | Andrew - In                          |  |
|---------|-----------|-----------------------------------|----------|-----------------|--|---|--------------------------------------|--|
| Policy  | LPA06     | Paragraph<br>/ diagram<br>/ table | 3HS      | Policies<br>Map | Sustainability Appraisal/ Strategic Environmental Assessment | X | Habitats<br>Regulation<br>Assessment |  |
|         |           | (please nan<br>levant part/s      |          |                 |  |   |                                      |  |

| 4. Do you consider the St He Please read the Guidance note |        | n 2020-2035 is:<br>Compliance and the Tests of Soundness |
|--|--------|--|
| Legally Compliant?   | Unsure |  |
| Sound?   |        | No   |
| Complies with the Duty to Cooperate                        |        | No   |

Please tick as appropriate

|                                  | is <u>unsound</u> , is it because it is not:<br>explanations of the Tests of Soundness |  |
|----------------------------------|--|--|
| Positively Prepared?             | X  |  |
| Justified?                       | X  |  |
| Effective?                       | X  |  |
| Consistent with National Policy? | X  |  |

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound</u> <u>or fails to comply with the duty to cooperate.</u> <u>Please be as precise as possible.</u>

If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

Having reviewed the St Helens Brownfield Register, it is apparent that there has been some miscalculation. The Register suggests that there are 5,818 dwellings available, yet the Plan states 7,040 dwellings, of which 4,085 will be built within the Plan period. The figures stated do not align and for this reason the Plan is not sound. The figures must be accurate and aligned for the Plan to be sound.

LPA05 states that 486 dwellings per annum (dpa) are required and there have been various projections within the 'Strategic Housing Market Assessment' (GL Hearn), with the





recommendation being 482dpa. The 2016 based projections have a proposed figure of 383dpa (see paragraph 8.8 of the GL Hearn report). The Plan does not seem to justify why 486dpa has been determined and for this reason the Plan is not justified. There also appears to be some confusion on the required dpa; item 1. In the table of paragraph 4.16 suggests 486dpa, yet paragraph 4.18.4 suggests the figure is 468dpa. This confusion seems to throw some of the report in to doubt.

The site at Cowley Hill (6HA), is understood to have a potential of more than 1,000 dwellings which could be built on this site; well above the 816 suggested in the Plan. The proposed density (35 units per Ha) is potentially lower than the developer would wish for and certainly the 75% net developable area is below what any developer would propose for such a site. The cost of remediation of such a brownfield site would need a greater land usage and density in order to maximise the economic viability for cost of remediation. It also understood that a potential developer would want to complete the entire site within the 15 year period of the proposed Plan, again due to economic viability. So, the Plan is unsound delivering only 516 dwellings at this site over its period as opposed to the probable 1,000+ dwellings which will happen over the Plan period.

Under section 3.2.1 of the Plan (Strategic Aims & Objectives), within the table under item 6.2 & 6.3 the protection of the environment and enhancement of green space is promoted. Paragraph 4.24.1 offers no real justification against this Aim rendering the proposal not justified nor sound.

Section 4.5 of the Plan states that all strategic aims have been met, however, item 4 of Policy LPA02 releases green belt. This does not meet Strategic Aim item 6 'Safeguarding and Enhancing Quality of Life'.

The Plan does not identify specific measures to deal with the Infrastructure Delivery to be incorporated with the use of the 3HS site, nor is anything specific referred to in the Infrastructure Delivery Plan. The area surrounding 3HS suffers significant congestion throughout the day, specifically between 07:30-09:15, 14:30-16:00 and 17:00-18:30 on weekdays. The arterial route of Warrington Road (A57) is always busy being a main route between M62, Whiston hospital (constantly having ambulances traversing through) and Prescot. The junction of Warrington Road (A57) and Rainhill Road (at Skew Bridge) is a significant 'bottleneck' point on this route and, should there be development of 3HS, would serve to increase congestion issues. There is also pressure on Elton Head Road and where this meets the A570 Linkway. The ongoing roadworks are intended to alleviate this however, it is believed that by changing the roundabout to a traffic signalled junction will not significantly improve the situation.

The traffic congestion concerns also lead the local community to concerns regarding **our** health. Contained within the Plan in paragraph 2.6.1 are the leading causes of death within our Borough. These are cancer and respiratory disease which can both be brought on by poor air quality. By the introduction of 3HS in the Plan, a significant green space, the local residents have genuine fear for our health with the introduction of at least 1,000 cars for any development on 3HS (not accounting for the added pollution throughout the construction phase). Coupled with the risk to health from congestion is the loss of trees from the 3HS site in which helps to offset some of the CO2 emissions.

The Transport Impact Assessment 2019 makes no reference to the 3HS site and has taken no account of the potential traffic increase from this site (or any of the other proposed 'safeguarded' sites) so, therefore, proves the Plan is not sound. As described above, the traffic situation is currently at breaking point and without a clear transport strategy considering the impacts of the 3HS site the proposals will have a detrimental effect on the road users within the wider area.

FORMAN)

LONGIDERO IN

The Infrastructure Delivery Plan also identifies the need for increased capacity for health care, emergency services, education and community services (leisure, libraries, etc.). Again, there appear to be no specific plans and we know that SHMBC support for community services has declined over the past decade. There does not appear to be any capacity within the local schools to support an increase in the magnitude of likely school places required by the development of the proposed 3HS site. The Infrastructure Delivery Plan **must** identify potential solutions to these issues before the 'safeguarding' of 3HS should be proposed. We cannot accept the confirmation of future development without a feasible plan in place to deal with the effects of such a population increase.

The healthcare system in the Borough is stretched and, again, there is deep concern regarding this especially coupled with the aspiration of increased life expectancy and the need to support an ageing population. We are fully aware of the NHS plans to commence a phased closing of the Accident & Emergency department at Whiston Hospital and are gravely concerned about the emergency healthcare, not only to the immediate area of 3HS, but also the entire borough. Sharing an A&E which is over 10miles (Liverpool Royal) is not feasible.

The current situation with doctors and dental surgeries is not sustainable with no registration available within a 5 miles radius of the 3HS site. Should development of this area be permitted, then the situation will worsen. School places are also currently over subscribed, with the local Primary and Secondary Schools have little chance of accommodating any further residents brought about by proposed new development. 'Bulge' classrooms, as referred in the Infrastructure Delivery Plan, will not offer a long term solution to this issue and are temporarily offering respite to over an already over subscribed area. These are primary concerns of all local residents, with the Infrastructure Delivery Plan offering no solution whatsoever. For this reason, the Plan is not justified.

The area surrounding 3HS is significantly developed and, should there be development on this site, there would be a continuation of urban development without any significant green space separation; joining the areas of Whiston, Portico, Thatto Heath, Rainhill and Nutgrove into one continuous sprawl.

There is no evidence of collaboration with neighbouring authorities to 'join up' proposals and, with specific consideration of traffic congestion, we envisage significant increase in congestion on the roads surrounding 3HS and access to M62 through the current development at Scotchbarn Lane and the proposed Halsnead Garden Village, which will inevitably increase the traffic around Rainhill; specifically, A57 and M62 Junction 7, which will have a knock on effect around the already congested 3HS site. The concerns regarding further loss of green belt land in the neighbouring authorities reinforces the need to retain the 3HS site as green belt and decrease the current urban sprawl across the Liverpool City Region and into neighbouring Cheshire. In effect, by seeing the development of Halsnead Garden Village and allowing 3HS to be 'safeguarded' is allowing Liverpool City to sprawl into a larger conurbation.

There does not appear to be an ecological report/survey to support the Local Plan, specifically identifying protected species. Having lived, walked and spent time around the 3HS site, we believe that there are protected species present. Owls can often be heard tooting at night, newts have been seen by some and it has been suggested that even Peregrine Falcons have previously nested on this site. The site has a variety of flora and fauna, offering precious habitat to support wildlife. LPC06 makes suggestions regarding mitigation should the benefits of development outweigh any harm to nature conservation. We do not believe that, should development be permitted following the 'safeguarding' of site 3HS, there is any potential to mitigate the wide open spaces that these precious species require. In the absence of a

EF0061

supporting Ecological Assessment and for the reasons outlined we do not believe the Plan is justified.

Whilst the SHMBC policy states that the land will be 'safeguarded' for housing after 2035 and we are assured that planning would be refused before then, we hold concerns regarding the use of the land over the next 16 years. We believe that the owners (Mulberry Homes) could potentially allow the land to become a derelict 'dumping ground' forcing a potential rethink of policy and potential change to current proposals. It is not unreasonable to be concerned that a developer may look for ways to expedite plans for the site they currently own.

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

In order for the plan to comply with the National Planning Policy Framework (2019), we believe that the land referred to as 3HS in the Local Plan should remain designated as Greenbelt and not be re-designated as 'safeguarded'. With particular reference to Clauses 136 and 137 of NPPF (2019) which clearly state that Green Belt boundaries should only be altered in exceptional circumstances and bearing in mind the comments made in 6. above, we do not believe that the circumstances to re-designate the land referred as 3HS as 'safeguarded' are 'exceptional' enough to warrant the destruction of Green Belt. The Plan is not consistent with national policy.

Please continue on a separate sheet if necessary

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

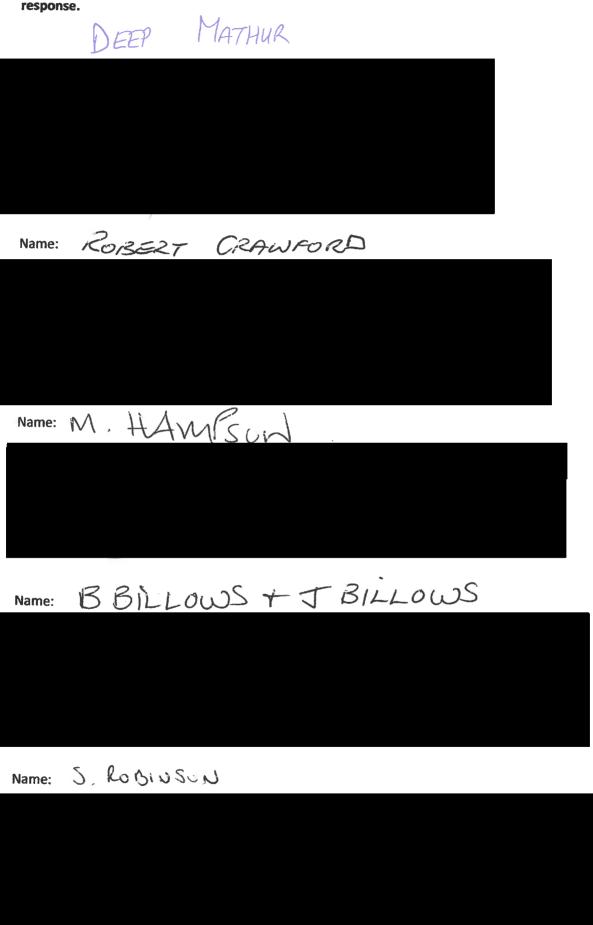
8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

No, I do not wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

EF0061

|   | Please note the Inspector will determine the most appropriate procedure to adopt to hear those |
|---|--|
|   | who have indicated that they wish to participate at the oral part of the examination           |
|   |  |
|   | Thank you for taking the time to complete and return this response form.                       |
|   | Places keep a convitor future reference.   |
| ) | Please keep a copy for future reference.   |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |



| Name: | AHMED | ABD EL GAWAIS |  |
|-------|-------|---------------|--|
|       |       |               |  |
| Name: | Dina  | Abdel Aal     |  |
|       |       |               |  |
| Name: | Nous  | Abdel causes  |  |
|       |       |               |  |
|       |       |               |  |
|       |       |               |  |
| Name: | Belal | Abdel Gavod   |  |
|       |       |               |  |
| Name: | Fatma | Abdel GAWAS   |  |
|       |       |               |  |
|       |       |               |  |

| Name: Dr. Mohammad Al-Jubouri | Name  |
|-------------------------------|-------|
|                               |       |
| Name: Mrs. Shilan Jamil       | Name: |
|                               |       |
| Name: Nicola O'Keeffe         | Name: |
|                               |       |
| Name: Nathan Okleffe          | Name: |
|                               |       |
|                               |       |
| Name: NEIL OKEEFFE            | Name: |
|                               |       |

| Name: | DR       | CHERYL  | SMITH |  |  |
|-------|----------|---------|-------|--|--|
|       |          |         |       |  |  |
| Name: | Victoria | a Snath |       |  |  |
|       |          |         |       |  |  |
| Name: | IAN      | CRMS    |       |  |  |
|       |          |         |       |  |  |
| Name: | Bawn     | craig   |       |  |  |
|       |          |         |       |  |  |
| Name: | Jack     | craig   |       |  |  |
|       |          |         |       |  |  |

| Name: | 13. HAZOE       |  |
|-------|-----------------|--|
|       |                 |  |
|       |                 |  |
| 1     |                 |  |
| Name: | R. Meddleton    |  |
|       |                 |  |
|       |                 |  |
|       |                 |  |
|       |                 |  |
| Name: | Sureil Aggannal |  |
|       |                 |  |
|       |                 |  |
|       |                 |  |
|       |                 |  |
| Name: | Bhockett        |  |
|       |                 |  |
|       |                 |  |
|       |                 |  |
|       |                 |  |
| Name: | PAUD EDGERION   |  |
|       |                 |  |
|       |                 |  |
|       |                 |  |
|       |                 |  |

| Name:   | CHRISTINE       | EDUERTON |  |
|---------|-----------------|----------|--|
|         |                 |          |  |
| Name:   | DR. G.T.        | JAYARAM  |  |
|         |                 |          |  |
| Name:   | Louise Jud      | GE.      |  |
|         |                 |          |  |
| Name:   | Simon GAR       | Frey     |  |
|         |                 |          |  |
| Name: / | Thomas Williams |          |  |
|         |                 |          |  |

| Name: | SIMON   | JONES  |  |
|-------|---------|--------|--|
|       |         |        |  |
| Name: | PETER   | Cottam |  |
|       |         |        |  |
| Name: | Jenna o | Coktam |  |
|       |         |        |  |
| Name: | IAN N   | OLAN   |  |
|       |         |        |  |
| Name: | SHEILA  | NOLAN  |  |
|       |         |        |  |

| Name: NICOLA ONYETT  |
|----------------------|
|                      |
| Name: Grace Onyett   |
|                      |
| Name: MICHELE HANNON |
|                      |
| Name: AULA EDWARDS   |
|                      |
| Name: GILL FARGIN    |
|                      |

| Name: | MICHAEL VINCENT   |
|-------|-------------------|
|       |                   |
| Name: | ADRIAN MOONEY     |
|       |                   |
| Name: | BERNADETTE MOONEY |
|       |                   |
|       |                   |
| Name: | PHIL ARLENS       |
|       |                   |
|       |                   |
| Name: | Tanyaba Khan      |
|       |                   |
|       |                   |
|       |                   |
|       |                   |

| Name: | ELLEEN   | BALMER. |  |
|-------|----------|---------|--|
|       |          |         |  |
| Name: | Dicks in |         |  |
|       | VICKI W  |         |  |
| Name: | clane    | Brogan  |  |
|       |          |         |  |
| Name: | peter B  | sragan  |  |
|       |          |         |  |
| Name: | Phil wig | nall    |  |
|       |          |         |  |

| Name: | JOE FARGIN       |
|-------|------------------|
|       |                  |
|       |                  |
| Name: | Lynn Turner      |
|       |                  |
|       | KIUPNER          |
| Name: | C rupion is      |
|       |                  |
|       |                  |
|       |                  |
|       |                  |
| Name: | EC12ABETH HUTTON |
|       |                  |
|       |                  |
|       |                  |
|       |                  |
| Name: | GILLIAN HORON    |
|       |                  |
|       |                  |
|       |                  |
|       |                  |

| Name: Mrs Sandra Tickle |  |
|-------------------------|--|
|                         |  |
| Name: Gaynar Lindley    |  |
|                         |  |
| Name: Antony hindley    |  |
|                         |  |
| Name: KATIE LINDLEY     |  |
|                         |  |
| Name: NEIL FYLE         |  |
|                         |  |

I give explicit permission for my name to be included in the Representation with the lead name of Adam Onyett regarding the St Helens Local Plan and confirm that we have worked together on this response.

| Name  | : TELENCE TUDOS       |
|-------|-----------------------|
|       |                       |
| Name: | Oliver sudge          |
|       |                       |
| Name: | PETER SMITH           |
|       |                       |
| Name: | STEPHEN SMITH         |
|       |                       |
| Name: | JACQUELINE ANNE SMITH |
|       |                       |

I give explicit permission for my name to be included in the Representation with the lead name of Adam Onyett regarding the St Helens Local Plan and confirm that we have worked together on this response.

| Name:      | Richard  | HADOCK  |       |  |  |  |
|------------|----------|---------|-------|--|--|--|
|            |          |         |       |  |  |  |
| Name:      | Lorenins | HAYDOUK |       |  |  |  |
|            |          |         |       |  |  |  |
| Name:      |          |         |       |  |  |  |
| Address:   |          |         |       |  |  |  |
| Signature: |          |         | Date: |  |  |  |
| Name:      |          |         |       |  |  |  |
| Address:   |          |         |       |  |  |  |
| Signature: |          |         | Date: |  |  |  |
| Name:      |          |         |       |  |  |  |
| Address:   |          |         |       |  |  |  |
| Signature: |          |         | Date: |  |  |  |





## St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

(For official use only)

Please also read the Representation Form Guidance Note that is available with this form, or online at: www.sthelens.gov.uk/localplan

Please ensure the form is returned to us by no later than 5pm on Wednesday 13th March 2019. Any comments received after this deadline cannot be accepted.

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)



#### PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

| Your Details (we will correspond via your agent)   | 2. Your Agent's Details (if applicable)  |
|--|--|
|  | Title:   |
| First Name: Sarah  | First name:  |
| Last Name: Offord  | Last Name:   |
|  | Organisation/company:  |
| Address: Manston Bungalows 31 Neills Road  | Address:   |
| Postcode: 1189 484   | Postcode:  |
|  | Tel No:  |
|  | Mobile No:   |
|  | Email:   |
| Signature:   | Date: 23 · 3 · 19  |
| Please be aware that anonymous forms cannot be considered you MUST include your details above. | accepted and that in order for your comments to be   |
|  | ges of the St Helens Borough Local Plan 2020-2035? ublication of the Inspector's recommendations and |
| Yes (via email)  | □ No   |
| Please note - email is the Council's preferred method will contact you by your postal address. | nod of communication. If no email address is provided,   |

#### **RETURN DETAILS**

Please return your completed form to us by no later than 5pm on Wednesday 13th March 2019 by:

post to:

Local Plan

St. Helens Council

Town Hall Victoria Square

St Helens WA10 1HP

or by hand delivery to:

Ground Floor Reception St. Helens Town Hall

(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

#### **FURTHER INFORMATION**

If you require further information please see the FAQs on our website: www.sthelens.gov.uk/localplan

If you still need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk

Telephone: 01744 676190

#### **NEXT STEPS**

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

#### **DATA PROTECTION**

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: www.sthelens.gov.uk/localplan

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

# Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

### **PART B - YOUR REPRESENTATION**

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

|            | 100-0                   | Two areas and the second         |           |  |                 |                |  |
|------------|-------------------------|----------------------------------|-----------|--|-----------------|----------------|--|
| Policy     | IPA06                   | Paragraph/<br>diagram<br>table   | 345       | Policies<br>Map                          | Appra<br>Strate | gic<br>nmental | Habitats<br>Regulations<br>Assessment                |
|            |                         | ts (please nar<br>elevant part/s |           |  |                 |                |  |
|            |                         |                                  |           | orough Local F<br>explanations of        |                 |                | e Tests of Soundness                                 |
| Legally    | Complia                 | int?                             |           |  | Yes             | No No          |  |
| Sound'     | ?                       |                                  |           |  | Yes             | No No          |  |
| Compli     | es with th              | ne Duty to Co                    | operate   |  | Yes             | No             |  |
| Please     | tick as a               | opropriate                       | -         |  |                 |                |  |
| Pleas      |                         | ne Guidance                      |           | unsound, is it explanations of           |                 |                |  |
| Justifie   | 4                       |                                  |           | X  |                 |                |  |
| Effective? |                         |                                  |           | ×  |                 |                |  |
| Consis     | tent with               | National Polic                   | y?        | K  |                 |                |  |
|            |                         |                                  |           |  |                 | 12072          |  |
| or fa      | ils to cor<br>I wish to | mply with the                    | e duty to | o cooperate. <u>Pl</u><br>ompliance or s | ease be as p    | precise as po  | npliant or is unsound<br>ssible.<br>lan, please also |

| rela<br>inca<br>the                                   | npliant or sound, having regard to the<br>ites to soundness (NB please note tha<br>apable of modification at examination)<br>Local Plan legally compliant or sound                                     | consider necessary to make the Local Plan legally matter you have identified at 6. above where this at any non-compliance with the duty to cooperate is ). You will need to say why this modification will make d. It will be helpful if you are able to put forward your or text. Please be as precise as possible. |
|---|--|--|
| Please  | note: your representation should cover   | Please continue on a separate sheet if necessary succinctly all the information, evidence and supporting   |
| will not<br>represe<br>After th<br>and iss<br>8. If y | normally be a subsequent opportunity to entation at the publication stage.  nis stage, further submissions will be sues he/she identifies for examination.  Four representation is seeking a modifier. | fication; do you consider it necessary to participate at   |
| the   | No, I do not wish to participate at the oral examination   | Yes, I wish to participate at the oral examination   |
|   | you wish to participate at the oral part<br>is to be necessary:  | of the examination, please outline why you consider  |

Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.





## St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

(For official use only)

Please also read the Representation Form Guidance Note that is available with this form, or online at: www.sthelens.gov.uk/localplan

Please ensure the form is returned to us by no later than 5pm on Wednesday 13th March 2019. Any comments received after this deadline cannot be accepted.

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

1 0 MAY 2019

#### PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

| Your Details     (we will correspond via your agent)  | 2. Your Agent's Details (if applicable)  |
|---|--|
|   | Title:   |
| First Name: Nakhan  | First name:  |
| Last Name: Orford   | Last Name:   |
|   | Organisation/company:  |
| 31 Neills Road  | Address:   |
| Postcode: WA9 45Y   | Postcode:  |
|   | No:  |
| Signature:  | Date: 21-3-19  |
| Please be aware that anonymous forms cannot be a considered you MUST include your details above.                              | accepted and that in order for your comments to be   |
| Vould you like to be kept updated of future stag<br>namely submission of the Plan for examination, pu<br>doption of the Plan) | es of the St Helens Borough Local Plan 2020-2035? blication of the Inspector's recommendations and |
| Yes (via email)   | □ No   |
| Please note - email is the Council's preferred meth   | od of communication. If no email address is provided   |

we will contact you by your postal address.

#### **RETURN DETAILS**

Please return your completed form to us by no later than 5pm on Wednesday 13th March 2019 by:

post to:

**Local Plan** 

St.Helens Council

Town Hall Victoria Square

St Helens WA10 1HP

or by hand delivery to:

Ground Floor Reception St.Helens Town Hall

(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

#### **FURTHER INFORMATION**

If you require further information please see the FAQs on our website: www.sthelens.gov.uk/localplan

If you still need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk

Telephone: 01744 676190

#### **NEXT STEPS**

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

#### DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: www.sthelens.gov.uk/localplan

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

# Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

### **PART B - YOUR REPRESENTATION**

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

| ations<br>ations<br>sment<br>oundness |
|---------------------------------------|
| oundness                              |
| oundness                              |
| and the second second                 |
|                                       |
|                                       |
|                                       |
|                                       |
|                                       |
|                                       |
|                                       |
|                                       |
|                                       |
|                                       |

| compliant or sound, having regard to the relates to soundness (NB please note that incapable of modification at examination).  | onsider necessary to make the Local Plan legally matter you have identified at 6. above where this any non-compliance with the duty to cooperate is. You will need to say why this modification will make it will be helpful if you are able to put forward your or text. Please be as precise as possible. |
|--|---|
|  |   |
|  |   |
|  | Please continue on a separate sheet if necessary  |
| will not normally be a subsequent opportunity to representation at the publication stage.  After this stage, further submissions will be o and issues he/she identifies for examination. | esentation and suggested modification, as there make further representations based on the original only at the request of the Inspector, based on matters cation; do you consider it necessary to participate at rings in public)   |
| No, I do not wish to participate at the oral examination   | Yes, I wish to participate at the oral examination  |
| 9. If you wish to participate at the oral part of this to be necessary:  | of the examination, please outline why you consider   |
|  |   |
|  |   |
|  |   |
| Please note the Inspector will determine the mo  | est appropriate procedure to adopt to hear those who have   |

indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.





## St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

(For official use only)

Please also read the Representation Form Guidance Note that is available with this form, or online at: www.sthelens.gov.uk/localplan

Please ensure the form is returned to us by no later than 5pm on Wednesday 13th March 2019. Any comments received after this deadline cannot be accepted.

This form has two parts:

Part A - Personal Details

Part B - Your Representation(s)

#### PART A - YOUR DETAILS

1 0 MAY 2019

Please note that you must complete Parts A and B of this form. 1. Your Details 2. Your Agent's Details (if applicable) (we will correspond via your agent) Title: MVSS Title: First Name: Chloe First name: Last Name: Last Name: Organisation/company: \_\_\_\_\_\_Organisation/company: \_\_\_\_\_ Address: Manston Bungalow Address: Postcode: Postcode: NA9 Tel No:\_\_\_\_\_ Mobile No: Signature Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you MUST include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via email)

□ No

Please note - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

#### **RETURN DETAILS**

Please return your completed form to us by no later than 5pm on Wednesday 13th March 2019 by:

post to:

**Local Plan** 

St. Helens Council

**Town Hall** 

Victoria Square

St Helens WA10 1HP

or by hand delivery to:

Ground Floor Reception St.Helens Town Hall

(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

#### **FURTHER INFORMATION**

If you require further information please see the FAQs on our website: www.sthelens.gov.uk/localplan

If you still need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk

Telephone: 01744 676190

#### **NEXT STEPS**

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

#### **DATA PROTECTION**

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: www.sthelens.gov.uk/localplan

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

# Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

### **PART B - YOUR REPRESENTATION**

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

| 1            | n part of the Loca                                      |                                  |                                 |                                |  | Tree and the second              |
|--------------|---|----------------------------------|---------------------------------|--------------------------------|--|----------------------------------|
| Policy       | Paragraph/<br>diagram<br>table                          | LAPCO                            | Policies<br>Map                 | 3HS                            | Sustainability Appraisal/ Strategic Environmental Assessment | Habitats Regulations Assessment  |
|              | uments (please na<br>and relevant part/s                |                                  |                                 |                                |  |                                  |
| 4. Do you o  | consider the St H<br>ead the Guidance                   | elens Be                         | orough Lo                       | ocal Plan                      | 2020-2035 is:<br>gal Compliance and th                       | e Tests of Soundness             |
| Legally Co   | mpliant?  |                                  |                                 | ☐ Yes                          | <b>⋈</b> No  |                                  |
| Sound?       |   |                                  |                                 | ☐ Yes                          | No No  |                                  |
| Complies v   | with the Duty to Co                                     | operate                          |                                 | ☐ Yes                          | No   |                                  |
| Please tick  | as appropriate  |                                  |                                 |                                |  |                                  |
| Positively F |   | note for                         | explanation                     |                                | Tests of Soundness   |                                  |
| Justified?   |   |                                  |                                 |                                |  |                                  |
| Effective?   | i<br>   |                                  |                                 |                                |  |                                  |
| Consistent   | with National Poli                                      | cy?                              |                                 | $\boxtimes$                    |  |                                  |
| or fails     | to comply with the ish to support the box to set out yo | e duty t<br>e legal c<br>our com | o coopera<br>omplianc<br>ments. | ate. <u>Pleas</u><br>e or sour | ndness of the Local F  | Plan, please also                |
|              | e houses  |                                  |                                 |                                |  | ese houses                       |
|              | ease in t   |                                  |                                 |                                | ncs.   |                                  |
|              | dongered  |                                  |                                 |                                |  |                                  |
| · Not        | enough  | · fc                             | xcilin                          | es -                           | schools, F   | pocturs, men                     |
| 6            |   |                                  |                                 |                                |  | y schetning                      |
| which        | mil be  | OUFF                             | eotec                           | y it i                         | inwented v   | nouses are                       |
| built.       |   |                                  |                                 |                                | Please conti   | nue on a separate sheet if neces |

. finally devoluing houses.

| relatinca<br>the L                 | pliant or sound, having regard to the mest to soundness (NB please note that pable of modification at examination).  Local Plan legally compliant or sound. | nsider necessary to make the Local Plan legally natter you have identified at 6. above where this any non-compliance with the duty to cooperate is You will need to say why this modification will make It will be helpful if you are able to put forward your r text. Please be as precise as possible. |
|------------------------------------|---|--|
|                                    |   |  |
|                                    |   | Please continue on a separate sheet if necessary   |
| After this<br>and issu<br>8. If yo | es he/she identifies for examination.   | ation; do you consider it necessary to participate at  |
|                                    | No, I do not wish to participate at the oral examination  | Yes, I wish to participate at the oral examination   |
|                                    | u wish to participate at the oral part of<br>to be necessary:   | the examination, please outline why you consider   |
|                                    |   |  |
|                                    |   |  |
|                                    |   |  |
|                                    |   |  |

Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.



St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

(For official use only)

Please also read the Representation Form Guidance Note that is available with this form, or online at: www.sthelens.gov.uk/localplan

Please ensure the form is returned to us by no later than 5pm on Wednesday 13th March 2019. Any comments received after this deadline cannot be accepted.

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

1 0 MAY 2019

#### PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

| 1. Your Details  | 2. Your Agent's Details (if applicable)   |
|--|---|
| (we will correspond via your agent)  |   |
|  | Title:  |
|  | First name:   |
|  | Last Name:  |
| Organisation/company: NA   | Organisation/company:   |
| Bold   | Address:  |
| SE REIENS  |   |
| Postcode: WAY 45Y  | Postcode:   |
|  | Tel No:   |
|  | Mobile No:  |
|  | Email:  |
| Signature:   | Date: 23 · 3 · 19-  |
| Please be aware that anonymous forms cannot be considered you MUST include your details above                              | be accepted and that in order for your comments to be e.  |
| Would you like to be kept updated of future so<br>(namely submission of the Plan for examination,<br>adoption of the Plan) | tages of the St Helens Borough Local Plan 2020-2035? publication of the Inspector's recommendations and |
| Yes (via email)  | □ No  |

Please note - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

#### **RETURN DETAILS**

Please return your completed form to us by no later than 5pm on Wednesday 13th March 2019 by:

post to:

**Local Plan** 

St. Helens Council

Town Hall Victoria Square

St Helens WA10 1HP

or by hand delivery to:

Ground Floor Reception

St. Helens Town Hall

(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

#### **FURTHER INFORMATION**

If you require further information please see the FAQs on our website: www.sthelens.gov.uk/localplan

If you still need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk

Telephone: 01744 676190

#### **NEXT STEPS**

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

#### **DATA PROTECTION**

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: www.sthelens.gov.uk/localplan

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

### PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

| D-II     |            | Danes and all I  |          | Dollaine        |            | Custeles h 11th  |          | Uahitata   |
|----------|------------|--|----------|-----------------|------------|--|----------|--|
| Policy   | LPA06      | Paragraph/<br>diagram<br>table   | 3HS      | Policies<br>Map |            | Sustainability Appraisal/ Strategic Environmental Assessment | ×        | Habitats<br>Regulations<br>Assessment                      |
|          |            | its (please na<br>relevant part/   |          |                 |            |  |          |  |
| -<br>    | 1          | . 1000.00  | MALVE    | ene to Valori   | 7. 25 7    |  |          |  |
|          |            |  |          |                 |            | <b>2020-2035 is:</b><br>al Compliance an                     | d the Te | ests of Soundness  |
| Legally  | / Complia  | ant?   |          |                 | Yes        | ≥ No   |          |  |
| Sound    | ?          |  |          | [               | Yes        | <b>⋈</b> No  |          |  |
| Compl    | ies with t | he Duty to Co  | operate  |                 | Yes        | <b>⋈</b> No  |          |  |
| Please   | tick as a  | ppropriate   |          |                 |            |  |          |  |
| Plea     |            | he Guidance  |          | explanation     | s of the   | ause it is not:<br>Tests of Soundne                          | SS       |  |
| Justifie | 3.4        | area :   |          |                 | <u>×</u> . |  |          |  |
| Effecti  |            |  |          | Į.              | <u>X</u> I |  |          |  |
|          |            | National Police  | CV?      | L               | <u>~</u>   |  |          |  |
| or fa    | ails to co | mply with th   | e duty t | o cooperate     | . Pleas    | lan is not legally<br>be as precise a<br>dness of the Loc    | s poss   |  |
|          |            | to set out yo  |          |                 | or sour    | uness of the Loc   | our riur | i, picuse uiso   |
| IN       | crease.    | of tray  | dic,     | Pollution       | . Has      | his of m   | afile    | Therease   |
| Jam      | ney bi     | me due   | , po     | more            | treat      | fie Dal  | × 11-5   | Dontie   |
|          |            |  |          |                 |            | eols, Doch   | 01 31    | Des Mis F  |
| عحر      | ches       | e to   | mor      | e to "          | this       | area.  |          |  |
| ro h     | anno       | our  | fan      | uly u           | yp U       | n the co   | min      | mysicle, so  |
| we       | cer        | ed va  | Dea      | 41              |            | on   | von      | mysicle so<br>of walk<br>stitlelen<br>built up<br>were Com |
| and      | r sh       | The own  | en       | 1.10            | -          | pours  | 2        | of Helen   |
| not      | 10         | LOOK   | CV       | or or           | 70         | es. That   | - AM     | Sweet W  |
| iau      | 2 into     | and the contraction of the contr | -5       | Cicle           | 15.        | mad bour   | 105      | San Cara   |

Please continue on a separate sheet if necessary

| rela<br>inc<br>the                  | ates to soundness (NB please note that apable of modification at examination). Local Plan legally compliant or sound.  | natter you have identified at 6. above where this any non-compliance with the duty to cooperate is You will need to say why this modification will mal It will be helpful if you are able to put forward your r text. Please be as precise as possible.                       |
|-------------------------------------|--|---|
|                                     |  |   |
|                                     |  |   |
|                                     |  | Please continue on a separate sheet if necess   |
| rma<br>not<br>rese<br>er th         | tion necessary to support/justify the repres<br>normally be a subsequent opportunity to r<br>entation at the publication stage.  | sentation and suggested modification, as there make further representations based on the original   |
| not<br>rese<br>er th                | tion necessary to support/justify the representation at the publication stage.  It is stage, further submissions will be or sues he/she identifies for examination.  | sentation and suggested modification, as there make further representations based on the original at the request of the Inspector, based on matter ation; do you consider it necessary to participate at  |
| not<br>rese<br>er th<br>d iss       | tion necessary to support/justify the representation at the publication stage.  This stage, further submissions will be on the submissions will be on the submissions.  The stage identifies for examination.  | sentation and suggested modification, as there make further representations based on the original only at the request of the Inspector, based on matter ation; do you consider it necessary to participate a  |
| ormanot reser the liss lifty the    | tion necessary to support/justify the representation at the publication stage.  It is stage, further submissions will be or sues he/she identifies for examination.  Our representation is seeking a modificational part of the examination? (the hearing like the oral examination).                                | sentation and suggested modification, as there make further representations based on the original only at the request of the Inspector, based on matter ation; do you consider it necessary to participate and in public)  Yes, I wish to participate at the oral examination |
| not rese er the liss lifty the      | tion necessary to support/justify the representation at the publication stage.  It is stage, further submissions will be or sues he/she identifies for examination.  Our representation is seeking a modificational part of the examination? (the hearing No, I do not wish to participate at the oral examination.) | sentation and suggested modification, as there make further representations based on the original only at the request of the Inspector, based on matter ation; do you consider it necessary to participate and in public)  Yes, I wish to participate at the oral examination |
| ormanot reser the liss lifty the    | tion necessary to support/justify the representation at the publication stage.  It is stage, further submissions will be or sues he/she identifies for examination.  Our representation is seeking a modificational part of the examination? (the hearing No, I do not wish to participate at the oral examination.) | sentation and suggested modification, as there make further representations based on the original only at the request of the Inspector, based on matter ation; do you consider it necessary to participate and in public)  Yes, I wish to participate at the oral             |
| not prese er the dissection. If you | tion necessary to support/justify the representation at the publication stage.  It is stage, further submissions will be or sues he/she identifies for examination.  Our representation is seeking a modificational part of the examination? (the hearing No, I do not wish to participate at the oral examination.) | sentation and suggested modification, as there make further representations based on the original only at the request of the Inspector, based on matter ation; do you consider it necessary to participate and in public)  Yes, I wish to participate at the oral examination |

indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.



## St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

(For official use only)

Please also read the Representation Form Guidance Note that is available with this form, or online at: www.sthelens.gov.uk/localplan

Please ensure the form is returned to us by no later than 5pm on Wednesday 13th March 2019. Any comments received after this deadline cannot be accepted.

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

### PART A - YOUR DETAILS

1 0 MAY 2019

Please note that you must complete Parts A and B of this form.

| 1. Your Details (we will correspond via your agent)  | 2. Your Agent's Details (if applicable)  |
|--|--|
|  | Title:   |
|  | First name:  |
|  | Last Name:   |
| Organisation/company:  | Organisation/company:  |
|  | Address:   |
|  | Postcode:  |
| Palantin   | Tel No:  |
|  | Mobile No:   |
|  | Email:   |
|  | 02.3.19  |
| Signature:   | Date: 23.3.19  |
| Please be aware that anonymous forms cannot be considered you MUST include your details above.                             | accepted and that in order for your comments to be   |
| Would you like to be kept updated of future stage (namely submission of the Plan for examination, puradoption of the Plan) | ges of the St Helens Borough Local Plan 2020-2035? ablication of the Inspector's recommendations and |
| ✓ Yes (via email)  | □ No   |

Please note - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

#### **RETURN DETAILS**

Please return your completed form to us by no later than 5pm on Wednesday 13th March 2019 by:

post to:

**Local Plan** 

St. Helens Council

Town Hall Victoria Square

St Helens WA10 1HP

or by hand delivery to:

Ground Floor Reception St. Helens Town Hall

(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

#### **FURTHER INFORMATION**

If you require further information please see the FAQs on our website: www.sthelens.gov.uk/localplan

If you still need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk

Telephone: 01744 676190

#### **NEXT STEPS**

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

#### DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: www.sthelens.gov.uk/localplan

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

### **PART B - YOUR REPRESENTATION**

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

| 3. To which par                                  | t of the Loca                            | al Plan d                            | loes this repre                           | esentation relate?   |  |
|--|--|--------------------------------------|---|--|--|
| Policy LPA06                                     | Paragraph/<br>diagram<br>table           | 3HS                                  | Policies<br>Map                           | Sustainability Appraisal/ Strategic Environmental Assessment | Habitats<br>Regulations<br>Assessment                            |
| Other document document and                      |  |                                      |   |  |  |
| 7. <u>2</u> 000 (360)                            |  |                                      |   | DI   |  |
|  |  |                                      |   | Plan 2020-2035 is:<br>f Legal Compliance and                 | d the Tests of Soundness   |
| Legally Complia                                  | ant?                                     |                                      |   | Yes 🔀 No   |  |
| Sound?   |  |                                      |   | Yes 🔀 No   | 1  |
| Complies with t                                  | he Duty to Co                            | operate                              |   | Yes No   |  |
| Please tick as a                                 | ppropriate                               |                                      |   |  |  |
|  |  |                                      |   | t because it is not: If the Tests of Soundnes                | SS   |
| Positively Prepa                                 | ared?                                    |                                      | $\bowtie$                                 |  |  |
| Justified?                                       |  |                                      | ×   |  |  |
| Effective?                                       |  |                                      | ×   |  |  |
| Consistent with                                  | National Poli                            | cy?                                  | $\boxtimes$                               |  |  |
| or fails to co<br>If you wish to<br>use this box | omply with the support the to set out yo | e duty to<br>e legal cour<br>our com | o cooperate. I<br>compliance or<br>ments. | Please be as precise as soundness of the Loc                 | al Plan, please also   |
| The read traffic the habitat                     | oy floor                                 | s and                                | ea are<br>w. Redu<br>. House              | not capable use greenbel                                     | of taking more<br>t means less<br>be reduced<br>t in a overcrows |
| due to   | NOT D                                    | ung                                  | a Ric                                     | hand see   | 1-100 Page   |
| over popu  | marea                                    | CH                                   | aleria l                                  | mousing as   | rates pring  |
| more cr  | une.                                     | D                                    | alone h                                   | rowe the p   | soricing to  |
| Cover t  | eno.                                     | , vot                                | Sour o                                    | + will en  | a up boing   |
| a no c   | go ar                                    | ec.                                  | way                                       | not use  | Drawn both   |
| comea, The                                       | ste 12                                   | eno                                  | uch e                                     | when forces  | lost of our  |
| Camptons   |  | u- 0                                 | AVC XX                                    | ye what's  | continue on a separate sheet if necessary                        |

| the   | mpliant or sound, having regard to the mates to soundness (NB please note that capable of modification at examination).                              | natter you have identified at 6. above where this any non-compliance with the duty to cooperate is You will need to say why this modification will make It will be helpful if you are able to put forward your or text. Please be as precise as possible.        |
|---|--|--|
| informa<br>will not<br>represe<br><b>After th</b> | ation necessary to support/justify the represendent opportunity to neentation at the publication stage.  This stage, further submissions will be one | Please continue on a separate sheet if necessary accinctly all the information, evidence and supporting sentation and suggested modification, as there make further representations based on the original only at the request of the Inspector, based on matters |
| and iss<br>8. If y                                | sues he/she identifies for examination.  | ation; do you consider it necessary to participate at  |
|   | No, I do not wish to participate at the oral examination   | Yes, I wish to participate at the oral examination   |
|   | ou wish to participate at the oral part of   | the examination, please outline why you consider   |
|   | s to be necessary:   | the examination, please outline willy you consider   |

Please keep a copy for future reference.

Thank you for taking the time to complete and return this response form.





## St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

(For official use only)

Please also read the Representation Form Guidance Note that is available with this form, or online at: www.sthelens.gov.uk/localplan

Please ensure the form is returned to us by no later than 5pm on Wednesday 13th March 2019. Any comments received after this deadline cannot be accepted.

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

1 0 MAY 2019

#### PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

| Your Details     (we will correspond via your agent)  | 2. Your Agent's Details (if applicable)   |
|---|---|
| Title:  | Title:  |
|   | First name:   |
|   | Last Name:  |
| Organisation/company:   | Organisation/company:   |
| Address: <u>manston Bungalou</u><br>31 Neill's Road   | Address:  |
| Postcode: WA9 USY   | Postcode:   |
| . 00.0000   | Tel No:   |
|   | Mobile No:  |
|   | Email:  |
|   |   |
| Signature:  | Date: 23·3·19   |
| Please be aware that anonymous forms cannot be considered you MUST include your details above.                                | e accepted and that in order for your comments to be  |
| Would you like to be kept updated of future sta<br>(namely submission of the Plan for examination, p<br>adoption of the Plan) | ges of the St Helens Borough Local Plan 2020-2035 ublication of the Inspector's recommendations and |
| Yes (via email)   | ☐ No  |
| Please note - email is the Council's preferred met<br>we will contact you by your postal address.                             | thod of communication. If no email address is provided  |

#### RETURN DETAILS

Please return your completed form to us by no later than 5pm on Wednesday 13th March 2019 by:

post to:

Local Plan

St. Helens Council

**Town Hall** 

Victoria Square

St Helens WA10 1HP

or by hand delivery to:

Ground Floor Reception

St. Helens Town Hall

(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

#### **FURTHER INFORMATION**

If you require further information please see the FAQs on our website: www.sthelens.gov.uk/localplan

If you still need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk

Telephone: 01744 676190

#### **NEXT STEPS**

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

#### DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: www.sthelens.gov.uk/localplan

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

# Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

### **PART B - YOUR REPRESENTATION**

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

|          |                         | t of the Local Pla                       | iii uoes iilis I   | chieseill               | ation relate:  |   |
|----------|-------------------------|--|--|-------------------------|--|---|
| Policy   | LPA06                   | Paragraph/<br>diagram<br>table           | Policies<br>Map  | 3H5                     | Sustainability Appraisal/ Strategic Environmental Assessment                 | Habitats<br>Regulations<br>Assessment                 |
|          |                         | ts (please name<br>relevant part/section | on)  |                         |  |   |
|          |                         | ider the St Helens<br>ne Guidance note   |  |                         |  | e Tests of Soundness                                  |
| Legally  | / Complia               | int?                                     |  | Yes                     | ₹ No   |   |
| Sound    | ?                       |  |  | ☐ Yes                   | Ŋo   |   |
| Compl    | ies with th             | ne Duty to Cooper                        | ate  | ☐ Yes                   | ⊠ No   |   |
| Please   | tick as ar              | ppropriate                               |  |                         |  |   |
| Plea     |                         |  |  |                         | Tests of Soundness   |   |
| Justifie | d?                      |  |  |                         |  |   |
| Effectiv | ve?                     |  |  | $\triangleright$        |  |   |
| Consis   | tent with               | National Policy?                         |  | $\boxtimes$             |  |   |
| or fa    | ils to cor<br>u wish to | mply with the dut                        | y to cooperated to the compliance of the complia | te. Please              | lan is <u>not legally con</u><br>be as precise as po<br>dness of the Local P |   |
| can      | tha<br>se               | t. I o                                   | re ad  | oluna<br>voluna<br>edds | another di   | ads flood. 7000 house ay through know ho y your on my |

| compliant or sound, having regard to the relates to soundness (NB please note the incapable of modification at examination the Local Plan legally compliant or sour  | consider necessary to make the Local Plan legally the matter you have identified at 6. above where this mat any non-compliance with the duty to cooperate is on). You will need to say why this modification will make and. It will be helpful if you are able to put forward your by or text. Please be as precise as possible. |
|--|--|
|  |  |
|  | Please continue on a separate sheet if necessary   |
| information necessary to support/justify the re will not normally be a subsequent opportunity representation at the publication stage.  After this stage, further submissions will be and issues he/she identifies for examination | er succinctly all the information, evidence and supporting epresentation and suggested modification, as there to make further representations based on the original e only at the request of the Inspector, based on matters n.  Iffication; do you consider it necessary to participate at                                      |
| No, I do not wish to participate at the oral examination   |  |
| 9. If you wish to participate at the oral parthis to be necessary:   | rt of the examination, please outline why you consider   |
|  |  |
| Please note the Inspector will determine the   | most appropriate procedure to adopt to hear those who have   |

indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.



#### St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at <a href="https://www.sthelens.gov.uk/localplan">www.sthelens.gov.uk/localplan</a>.

Please ensure the form is returned to us by no later than <u>5pm on Wednesday 13th March</u> 2019. Any comments received after this deadline <u>cannot</u> be accepted.

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s).

#### PART A - YOUR DETAILS

1 3 MAY 2019

Please note that you must complete Parts A and B of this form.

| 1. Your Details                          | 2. Your Agent's Details (if applicable) (we will correspond via your agent) |
|--|---|
| Title: Miss                              | Title:  |
| First Name: New York                     | First name:   |
| Last Name: Oscurrape                     | Last Name:  |
| Organisation/company: Rutland House Vers | Organisation/company:   |
| Address: 61 Banashe Drive                | Address:  |
| Postcode: WAIZ BEE                       | Postcode:   |
|  | Tel No:   |
|  | Mobile No:  |
|  | Email:  |
| Signature:                               | Date: 25.3.19   |

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you MUST include your details above.

| Would you like to be kept update Plan 2020-2035? (namely submiss Inspector's recommendations and | od of future stages of the St Helens Borough Local ion of the Plan for examination, publication of the adoption of the Plan) |
|--|--|
| Yes (Via Email)  | No 🖸   |
| Please note - e-mail is the Council address is provided, we will contact                         | s preferred method of communication. If no e-mail tyou by your postal address.   |



#### St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

(For official use only)

Please also read the Representation Form Guidance Note that is available with this form, or online at www.sthelens.gov.uk/localplan.

Please ensure the form is returned to us by no later than 5pm on Monday 13th May 2019. Any comments received after this deadline cannot be accepted.

This form has two parts:

Part A - Personal Details

Part B – Your Representation(s).

#### PART A - YOUR DETAILS

address is provided, we will contact you by your postal address.

| 1. Your Details  | Your Agent's Details (if applicable) (we will correspond via your agent) |
|--|--|
| Title: MR  | Title:   |
| First Name: DAVID  | First name:  |
| Last Name: OWEN  | Last Name:   |
| Organisation/company:  | Organisation/company:  |
| Address: 17. NEW TXXXD COURT,<br>ST. HELENS  | Address:   |
| Postcode: WA9 476  | Postcode:  |
| Tel No:  | Tel No:  |
| Mobile No:   | Mobile No:   |
| Email:   | Email:   |
| Signature:   | Date: 24/04/2019.  |
| lease be aware that anonymous forms cann<br>omments to be considered you MUST includ |  |
| Mind I down the feet hand and affect   | ure stages of the St Helens Borough Local                                |
| Plan 2020-2035? (namely submission of the Inspector's recommendations and adoption   | e Plan for examination, publication of the of the lan)                   |
| Plan 2020-2035? (namely submission of th   | e Plan for examination, publication of the                               |



### St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

(For official use only)

Please also read the Representation Form Guidance Note that is available with this form, or online at www.sthelens.gov.uk/localplan.

Please ensure the form is returned to us by no later than 5pm on Monday 13th May 2019. Any comments received after this deadline cannot be accepted.

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s).

1 3 MAY 2019

### PART A - YOUR DETAILS

| Your Agent's Details (if applicable (we will correspond via your agent) |  |  |
|---|--|--|
| Title:  |  |  |
| First name:   |  |  |
| Last Name:  |  |  |
| Organisation/company:   |  |  |
| Address:  |  |  |
| Postcode:   |  |  |
| Tel No:   |  |  |
| Mobile No:  |  |  |
| Email:  |  |  |
| ate: 22.04.2019   |  |  |
|   |  |  |

|   | ed of future stages of the St Helens Borough Local sion of the Plan for examination, publication of the adoption of the Plan) |
|---|---|
| Yes (Via Email)   | No [  |
| Please note - e-mail is the Counci address is provided, we will conta | l's preferred method of communication. If no e-mail ct you by your postal address.  |



### St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at www.sthelens.gov.uk/localplan.

Please ensure the form is returned to us by no later than <u>5pm on Monday 13<sup>th</sup> May 2019</u>. Any comments received after this deadline <u>cannot</u> be accepted.

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s).

1170 13 MAY 2019

2. Your Agent's Details (if applicable)

### PART A - YOUR DETAILS

1. Your Details

Please note that you must complete Parts A and B of this form.

|  | (we will correspond via your agent)  |
|--|--|
| Title: MAS   | Title:   |
| First Name:  | First name:  |
| Last Name:<br>○ ⋈ ⋐ ⋈  | Last Name:   |
| Organisation/company:  | Organisation/company:  |
| Address: 49 FOREST RD<br>SUTTON MANOR<br>STHELLEM  | Address:   |
| Postcode: Wnalar   | Postcode:  |
|  | Tel No:  |
|  | Mobile No:   |
|  | Email:   |
| Signature:   | Date: 28131  |
| lease be aware that anonymous forms cannot bomments to be considered you MUST include you  | be accepted and that in order for your our details above.  |
| lease be aware that anonymous forms cannot be be considered you MUST include you Would you like to be kept updated of future Plan 2020-2035? (namely submission of the Plan spector's recommendations and adoption of the Plan 2020-2035?) | be accepted and that in order for your our details above.  Stages of the St Helens Borough Local lan for examination, publication of the the Plan) |
| lease be aware that anonymous forms cannot be comments to be considered you MUST include you Would you like to be kept updated of future Plan 2020-2035? (namely submission of the Plan 2020-2035)   | be accepted and that in order for your our details above.  stages of the St Helens Borough Local lan for examination, publication of the           |



### St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at <a href="https://www.sthelens.gov.uk/localplan">www.sthelens.gov.uk/localplan</a>.

Please ensure the form is returned to us by no later than <u>5pm on Monday 13<sup>th</sup> May 2019</u>. Any comments received after this deadline <u>cannot</u> be accepted.

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s).

117 | PIDS YAM E 1

### **PART A - YOUR DETAILS**

Please note that you must complete Parts A and B of this form.

| 1. Your Details  | 2. Your Agent's Details (if applicabl (we will correspond via your agent) |  |  |
|--|---|--|--|
| Fitle: MR.   | Title:  |  |  |
| First Name: DEPER  | First name:   |  |  |
| Last Name: OWEN  | Last Name:  |  |  |
| Organisation/company:  | Organisation/company:   |  |  |
| Address: 49 FORCEST MD   | Address:  |  |  |
| Postcode: WNQUATSTHECENT   | Postcode:   |  |  |
|  | Tel No:   |  |  |
|  | Mobile No:  |  |  |
|  | Email:  |  |  |
| Signature:   | Date: 28 3 (  |  |  |
| lease be aware that anonymous forms cannot be comments to be considered you MUST include you Would you like to be kept updated of future | our details above.  stages of the St Helens Borough Local                 |  |  |
| Plan 2020-2035? (namely submission of the P<br>Inspector's recommendations and adoption of   |   |  |  |
| Hispector's recommendations and adoption or  | and i lam,  |  |  |

Please note - e-mail is the Council's preferred method of communication. If no e-mail

address is provided, we will contact you by your postal address.

#### **Representor Details**

| Web Reference Number | WF0202             |
|----------------------|--------------------|
| Type of Submission   | Web submission     |
| Full Name            | Mr John Owen       |
| Organisation         |                    |
| Address              | 63 Alder Road      |
|                      | Prescot            |
|                      | Merseyside L34 2SG |
| Agent Details        |                    |

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

#### 3. To which part of the Local Plan does this representation relate?

| Policy                               | LPA06 |
|--------------------------------------|-------|
| Paragraph / diagram / table          | 3HS   |
| Policies Map                         |       |
| Sustainability Appraisal / Strategic | X     |
| Environmental Assessment             |       |
| Habitats Regulation Assessment       |       |
| Other documents                      |       |

#### 4. Do you consider the St Helens Borough Local Plan 2020-2035:

| Is legally compliant?                | No |
|--------------------------------------|----|
| Is sound?                            | No |
| Complies with the duty to cooperate? | No |

#### 5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

## 6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

I firmly believe that the land of Eccleston Park Golf Club should not be removed from the Green Belt to become safe guarded and that the St Helens Borough Local Plan 2020-2035 is unsound for the following reasons.

As a local resident living very close to the golf course it is clear that the transport infrastructure, notably the road infrastructure is made up of already busy B roads struggling cannot cope with the current level of road traffic during peak times. Adding to this will only generate more traffic and therefore more noise and higher air pollution levels for the residents living in the area. Warrington Road (the only A road) in particular is already stretched serving various areas such as Rainhill, Prescot, Eccleston Park, Whiston etc. and this includes new developments such as Scotchbarn Lane, Stephenson Grove, Two Butt Lane and others. Between 2013 and 2015 St Helens was well above the national average for respiratory disease in the under 75's (51.9 deaths per 100,000 vs the average of 33.1 for the rest of England) with Thatto Heath one of the highest effected areas in the borough. Thatto Heath is one of the directly affected areas as a result of the removal of EPGC from the Green Belt and one that particularly can't afford any increase in deaths related to respiratory disease. On top of this the plan is putting pedestrian safety at risk with many residents choosing to walk to the local train station, bus stop or even the local shop. Other smaller estates and also minor B and C roads could also be impacted such as Alder Road which is already utilised by drivers as a shortcut.

Other roads such as Mill Lane, Longton Lane and Blundells Hill would likely see increase in traffic and such roads were never built to handle those levels of traffic meaning that significant investment would be required to make them suitable for the amount of traffic.. St Helens Council figures confirm that the junction of Portico Lane and Prescot Road are at capacity and as someone who uses this junction on a daily basis I am in agreement that from a safety perspective this junction cannot handle an increase in traffic. Cars will be required for any developments on ECPG as there simply is not enough local services to cope with the demand e.g. dentist, doctors, hospital and particularly school places. I believe that Brexit and the impact of it has also not been factored into this plan, we know that we have a declining population (since 1981) and that Brexit could further reduce the population so it is questionable as to where all the additional people are coming from to justify such an increase in housing. From reviewing the St Helens Council Brownfield register it is apparent that there is availability for 5808 houses. Table 4.6 illustrates a requirement for 7245 houses therefore leaving a need for 1437 houses, it is not clear why the local plan is detailing a 288 hectare requirement and this needs further explanation. We know that 3HS is a confirmed flood zone and has a very high water table, as my property has a small brook to the rear of the garden I think that building on EPGC would seriously put my property and many others at risk of flooding. Finally I have concerns that any development on EPGC would seriously impact existing property pricing by removing an area of natural beauty and essentially creating one continuous area of urban dwellings. It is also noted that Sport England objected to EPGC status being changed from a Golf Club at stage one and as far as I can see this objection has not been addressed by St Helens Council nor have the council provided any compelling evidence that there is an over subscription to gold within the area.

#### 7. Please set out modification(s) you consider are necessary

St Helens Council should not consider removing Eccleston Park Golf Club land from the Green Belt to place in safeguarded for the reasons mentioned in this representation. Eccleston Park Golf Club should be removed from the proposal to remove from the greenbelt therefore abiding by the National Planning Policy Framework (2019).

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

| Response Date | 3/11/2019 9:15:50 PM |
|---------------|----------------------|
|---------------|----------------------|



### St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at <a href="https://www.sthelens.gov.uk/localplan">www.sthelens.gov.uk/localplan</a>.

Please ensure the form is returned to us by no later than <u>5pm on Monday 13<sup>th</sup> May 2019</u>. Any comments received after this deadline <u>cannot</u> be accepted.

This form has two parts;

Part A – Personal Details

Part B - Your Representation(s).

### PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

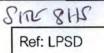
| 1. Your Details  | 2. Your Agent's Details (if applicable (we will correspond via your agent) |  |
|--|--|--|
| Title: MR  | Title:   |  |
| First Name: MICHAEL  | First name:  |  |
| Last Name:<br>OWENS  | Last Name:   |  |
| Organisation/company:  | Organisation/company:  |  |
| Address: 4, CRANSHAW AVENUE CLOCK FACE ST.HELENS Postcode: WA9 4UR | Address:  Postcode:  |  |
|  | Tel No:  |  |
|  | Mobile No:   |  |
|  | Email:   |  |
| Signature:   | Date: 8. 4.19.   |  |

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you MUST include your details above.

|   | ed of future stages of the St Helens Borough Local<br>ion of the Plan for examination, publication of the<br>adoption of the Plan) |
|---|--|
| Yes (Via Email)   | No 🗌   |
| Please note - e-mail is the Council' address is provided, we will contact | s preferred method of communication. If no e-mail tyou by your postal address.   |

777

1 3 MAR 2019





www.sthelens.gov.uk/localplan

# St Helens Borough Local Plan 2020-2035 (Submission Draft) (For official use only) Representation (i.e. Comment) Form

Please also read the Representation Form Guidance Note that is available with this form, or online at:

Please ensure the form is returned to us by no later than 5pm on Wednesday 13th March 2019.

| Part A - Personal Details   | Part B - Your Representation(s) 1DP   |  |  |  |
|---|---|--|--|--|
| PART A - YOUR DETAILS  lease note that you must complete Parts A and B  | (D) Car I m.  |  |  |  |
| Your Details (we will correspond via your agent)  | 2. Your Agent's Details (if applicable)   |  |  |  |
|   | Title:  |  |  |  |
|   | First name:   |  |  |  |
|   | Last Name:  |  |  |  |
| Organisation/company:   | Organisation/company:   |  |  |  |
|   | Address:  |  |  |  |
| ST HELENS   |   |  |  |  |
| Postcode: WA 10 634   | Postcode:   |  |  |  |
| Tel No  | Tel No:   |  |  |  |
|   | Mobile No:  |  |  |  |
| Email:  | Email:  |  |  |  |
|   |   |  |  |  |
| Signature:  | Date: 13.3-2019   |  |  |  |
| considered you MUST include your details above.   |   |  |  |  |
| <b>Vould you like to be kept updated of future sta</b><br>namely submission of the Plan for examination, p<br>adoption of the Plan) | ages of the St Helens Borough Local Plan 2020-203<br>publication of the Inspector's recommendations and |  |  |  |
| Yes (via email)   | ☐ No  |  |  |  |
| Please note - email is the Council's preferred me ve will contact you by your postal address.                                       | thod of communication. If no email address is provide   |  |  |  |

#### **RETURN DETAILS**

Please return your completed form to us by no later than 5pm on Wednesday 13th March 2019 by:

post to:

Local Plan

St. Helens Council

Town Hall

Victoria Square

St Helens

**WA10 1HP** 

or by hand delivery to:

Ground Floor Reception

St. Helens Town Hall

(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

#### **FURTHER INFORMATION**

If you require further information please see the FAQs on our website: www.sthelens.gov.uk/localplan

If you still need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk

Telephone: 01744 676190

#### **NEXT STEPS**

The Council intends to submit the St. Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

#### DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: www.sthelens.gov.uk/localplan

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

### PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

|                                  | part of the Local  | Plan does this                    | representat                         | ion relate?  |           |                                       |     |
|----------------------------------|--|-----------------------------------|-------------------------------------|--|-----------|---------------------------------------|-----|
| Policy                           | Paragraph/<br>diagram<br>table                                   | Policies<br>Map                   | 1 1                                 | Sustainability<br>Appraisal/<br>Strategic<br>Environmental<br>Assessment | ✓         | Habitats<br>Regulations<br>Assessment |     |
|                                  | ments (please nan<br>nd relevant part/s                          |                                   | -                                   |  |           |                                       |     |
| 4. Do you c                      | onsider the St He  | elens Borough<br>note for explana | Local Plan 2<br>tions of Lega       | <b>020-2035 is:</b><br>I Compliance ar                                   | nd the Te | ests of Soundne                       | ess |
| Legally Con                      | npliant?   |                                   | Yes                                 | ₩ No   |           |                                       |     |
| Sound?                           | phare  |                                   | Yes                                 | Ŋ No   |           |                                       |     |
|                                  | ith the Duty to Co   | operate                           | Yes                                 | No.  |           |                                       |     |
|                                  | as appropriate   |                                   |                                     | /  | -         |                                       |     |
| Justified? Effective? Consistent | with National Polic  | y?                                | N<br>N<br>N<br>N                    |  |           |                                       |     |
|                                  |  |                                   |                                     |  |           | liant or is unso                      |     |
| 6. Please g<br>or fails t        | ive details of who comply with the support the box to set out yo | e duty to coope<br>legal complia  | erate. <u>Please</u><br>nce or soun | be as precise  | as poss   | ible.                                 | una |

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

NO DEJGLORMENTI ON OPEGNOEIT HOLTEL BROWNED

SITES ARE USED - NO DEJGLORMENT ON GREENBELT

(8 HS) UNTIL ROAD INFRASTRUCTURE FIXED 
SEE AMACHES SHEET

Please continue on a separate sheet if necessary

**Please note:** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

#### **Dear Sirs**

This continuation sheet is further to my Representation/Comment form. I find it necessary to use this continuation sheet because I find the format of the Comment Form too complicated and misleading to complete within the small spaces allocated.

I think that the Local Plan Submission Draft is not legally compliant, sound or complies with the duty to cooperate and is certainly not justified or consistent with the national policy for the following reasons:

I believe that the Plan is not legally compliant because:

As late as 12<sup>th</sup> December 2018 the Council Cabinet meeting stated that the Statement of Common Ground was still being prepared. Obviously this was too late for the preparation of the Local Plan and therefore the requirements of the plan making PPG para 054 have not been met.

Not surprisingly it is lacking in evidence to demonstrate that it satisfies the Duty to Cooperate on the matters of Employment Land, Remediation of Brownfield land, Transport and Traffic, (including road infrastructure) and local amenities.

I believe that St Helens Council have not proved "exceptional circumstances" for removing land from Green Belt and I believe that the plan is not positively prepared, justified, effective or consistent with the National Planning Policy.

The Plan is not positively prepared because there is little or no evidence of agreements with other areas and by releasing Green Belt land unnecessarily; the plan does not achieve sustainable development.

No statement is available on how the Council has fulfilled it's Duty to Cooperate. The Council are proposing significant development without showing how it will impact elsewhere.

#### **Duty to Cooperate.**

The economic growth predictions, not just for St Helens, but for the neighbouring boroughs within the Liverpool City Region (LCR) are based on the flawed methodology nationally using NPPF Guidelines, ONS statistics (2016) instead of (2018) which do not take into account differing regional requirements. (this has recently been debated in Government).

This has resulted in a "free for all" within the LCR with many houses being built needlessly, without any apparent collusion between boroughs. The latest plans by Lancashire County Council proposes the construction of 6000 houses 5 miles to the north of St Helens. These dwellings are contiguous to the A570 Rainford bypass and although they straddle the M58 motorway it is obvious that there will be peak time pressures on Windle Island as commuters seek access to west Manchester and east Liverpool as up to 10000 cars (6000 x 1.8 national average car per household) could be involved.

St Helens MBC is a member of the Liverpool City Partnership and as such is privy to the planning issues being passed as the programme for the Northern Powerhouse is rolled out but continues to push ahead to please the developers, ignoring the views of the local residents. There is no obvious cooperation to provide an integrated transport plan between St Helens, Knowsley, Wigan or Warrington. Any employees would need to travel by private cars to the new business parks as there is no existing public transport or any published plans for the future.

#### **Employment Land**

The Oxford Economics transformational Growth forecasts (2016) are all quoted as being critical in informing assumptions about industry growth and the demand for employment land but are nowhere to be accessed despite formal enquiries being made to SHBC and the Liverpool City Region.

The Employment Land Needs Study addendum report (January 2109) states that "this modelling had input from St Helens Council in regards to promoted major development projects being considered in the preparation of the Local Plan Preferred Options, being focused on logistics and warehousing schemes, including potential Green Belt sites around Haydock, west of Omega and Parkside West and East"

If this statement is true, it means that the Council itself set the criteria for transformational growth including the use of Green Belt land is a subjective and aspirational scenario and not an objectively based needs assessment of economic and market trends.

It follows that SHBC have directly informed a set of economic aspirations which have become joint planning policy. For this reason I believe that the plan has not been positively prepared.

SHMBC must be aware of the extent of the aspirational numbers of jobs being promised by developers without any hard evidence of these jobs materialising eg The Amazon warehouse at Florida Farm promises many jobs, but the trade press heralds Amazon's recent acquisition of robotisation software to ensure efficiency and cost savings by reducing workplace numbers. I do not believe that the actual jobs created will match the number of jobs promised.

I am dismayed at the number of giant warehouses springing up along the A580, each needing HGVs to supply stock for disbursement and HGVs and LGVs to distribute to final destinations. I fear that many of these sites will fail to reach their planned potential, leaving a legacy of derelict sheds and wasted unoccupied land.

#### **Brownfield sites**

St Helens Councillors state that the cost of cleaning up the Brownfield sites of St Helens would cost £40 million. This is without any apparent investigation into the feasibility of cleaning Brownfield sites as they are brought onto the Brownfield register. I have not seen any report of the Council's effort to bid for these monies, successful or not.

The Council, in conjunction with Liverpool City Combined Authority have no policy for bringing unsuitable sites outside the Brownfield register back into use. It is not reasonable to assume that sites cannot be made available within the 15 year safeguarded plan period.

#### **Traffic Issues**

The impending effects of the Superport at Bootle expansion means that there will be an explosion of HGV traffic to service the burgeoning warehousing between the M57 and the M6.

Already these units are advertising **DIRECT** access for HGVs to Liverpool and Manchester by using the A580 and passing Windle Island in both directions.

The Council's plan to build 1027 new homes on 8HS states that there will be an access road onto the A580 by rerouting Houghtons Lane. The stretch of the A580 between Windle Island and the junction of Blindfoot Road only is 1.4 miles, with 3 intersections onto a busy crowded freeway. This area has seen 3 fatalities recently and an estimated 1800 extra cars at peak times is not sustainable.

#### Windle Island

The Local Infrastructure Delivery Plan (IDP) also states that there will be access to the Junction of Bleak Hill road and Rainford Road. Given that the new "improvements" to Windle Island include a forced exit from Tesco garage/Costa coffee onto Rainford road for traffic turning northwards along the A570 (Rainford bypass). In the opinion of the local residents this is sheer stupidity and will lead to even more complications at this junction.

6

This plan promotes unsustainable traffic growth that will not satisfy the NPPF (2018) guidelines — (para109) — "Development should only be prevented or refused if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe"



This is echoed in the Council's own proposed submission draft (LP01 sec 4.25) which includes the following:

"3. New development will only be permitted if it would: a) maintain the safe and efficient flow of traffic on the surrounding highway network. Development proposals will not be permitted where vehicle movements would cause severe harm to the highway network b) be located and designed to enable a suitable level of access (having regard to the scale and nature of the proposal) to existing and / or proposed public transport services."

To propose a housing development in the face of these obstacles shows a clear disregard for NPPF guidelines regarding the plan being positively prepared and it is clearly not sustainable without a major revision of highways infrastructure.

]②

Community Infrastructure: Currently this area has a much reduced and inadequate bus service with a new health centre built nearly a mile away and not accessible by bus. Older residents and non drivers are forced to use taxis to access this amenity or to visit local supermarkets. Because of these difficulties, many non drivers and disabled residents have to shop online, thus bringing more delivery vans into the existing local area. The idea of building a further 1100 houses is totally unsustainable.



I feel that a suitable alternative to this plan would be to maintain the farming activity, thus protecting our food supply (especially in the face of Brexit uncertainty), Plant wildflower corridors within the crops and deciduous trees around the perimeter of this land, providing a carbon sink to offset the effects of the increased pollution that the extra traffic will bring.

SUCCESIONS.

Taking into account all these reasons, I feel that the Latest Plan Submission should be rejected on the grounds that it cannot accommodate more houses with the present infrastructure and the land should be better used for environmental protection.

**Yours Sincerely** 

Mrs I M Oxford

39 Windlebrook Crescent, St Helens WA10 6DY

778

1 3 MAR 2019

Ref: LPSD



# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Please also read the Representation Form Guidance Note that is available with this form, or online at:

(For official use only)

| r than 5pm on<br>be accepted. | Wednesday 13th Marc   | ch 2019.   |
|-------------------------------|---|--|
| be accepted.                  |   | -  |
|                               | 17.206C   | (B) LPAOL  |
|                               |   | @ IDP  |
| Part B - You                  | ② LPAOZ<br>ir Representation(s)   | Guara  |
|                               | 3 LPNO4   | (DLPAO8  |
| f this form                   | (1) Crenkern  |  |
| of this form.                 | 6 44.000  | ,  |
| 2. Your Age                   | nt's Details (if applica  | ble)   |
|                               |   |  |
| Title:                        | ***************************************   |  |
| First name:                   |   |  |
| Last Name:                    | ·   |  |
| Organisation                  | /company:   |  |
|                               |   |  |
| Address:                      |   | **************   |
|                               | ·····   | ,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,   |
|                               | ***************************************   | * 180 * 1 mm.  |
|                               |   |  |
| Tel No:                       |   |  |
| Mobile No:                    |   | ************************   |
|                               |   |  |
|                               |   |  |
|                               | · · · · · · · · · · · · · · · · · · ·   |  |
|                               |   |  |
|                               | Date: /3 3 _  | 1 10   |
|                               | 11310. (-) - 3  | 1019   |
|                               | Title:  First name:  Last Name:  Organisation  Address:  Postcode:  Tel No:  Mobile No: | Title: Last Name: Organisation/company: Address: Postcode: Tel No: Mobile No: Email: |

#### **RETURN DETAILS**

Please return your completed form to us by no later than 5pm on Wednesday 13th March 2019 by:

post to:

Local Plan

St. Helens Council

Town Hall

Victoria Square

St Helens

**WA10 1HP** 

or by hand delivery to:

**Ground Floor Reception** 

St. Helens Town Hall

(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

#### **FURTHER INFORMATION**

If you require further information please see the FAQs on our website: www.sthelens.gov.uk/localplan

If you still need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk

Telephone: 01744 676190

#### **NEXT STEPS**

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

#### **DATA PROTECTION**

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: www.sthelens.gov.uk/localplan

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

### **PART B - YOUR REPRESENTATION**

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

| 3. To which part of the Local Plan does this representation relate?   |   |                 |                         |  |              |                                       |    |
|---|---|-----------------|-------------------------|--|--------------|---------------------------------------|----|
| Policy  | Paragraph/<br>diagram<br>table            | Policies<br>Map |                         | Sustainability Appraisal/ Strategic Environmental Assessment | $\checkmark$ | Habitats<br>Regulations<br>Assessment |    |
| Other documents (please name document and relevant part/section)  |   |                 |                         |  |              |                                       |    |
| Do you consider the St Helens Borough Local Plan 2020-2035 is:  Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness   |   |                 |                         |  |              |                                       |    |
| Legally Con   | ppliant?                                  |                 | ☐ Yes                   | <b>⊠</b> No  | 1            |                                       |    |
| Sound?  |   |                 | Yes                     | <b>∑</b> No  |              | •                                     |    |
| Complies w  | ith the Duty to Coop                      | erate           | ☐ Yes                   | ∑ No   |              |                                       |    |
| Please tick a   | as appropriate                            |                 | ,                       |  |              | ****                                  |    |
|   | nsider the Local Pl<br>ad the Guidance no |                 |                         |  | SS           |                                       |    |
| Positively Pr   | epared?                                   |                 |                         |  |              |                                       | 7, |
| Justified?  |   |                 | $\boxtimes$             |  |              |                                       |    |
| Effective?  |   |                 | $oldsymbol{\mathbb{Z}}$ |  |              |                                       |    |
| Consistent v  | vith National Policy?                     |                 | X                       |  |              | 3                                     |    |
| 6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.  If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments. |   |                 |                         |  | und          |                                       |    |
| N.  | of Sound                                  |                 |                         |  |              |                                       |    |
|   | - Sei                                     | ATTACK          | 4)                      |  | *            |                                       |    |
| •   |   |                 | -                       |  |              |                                       |    |
|   |   |                 |                         |  |              |                                       |    |
|   |   |                 |                         |  |              | 4                                     |    |

| 7. | Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please he as precise as nossible |
|----|---|
|    | suggested revised wording of any policy or text. Please be as precise as possible.  |

NO BUILDING SHOULD TARE PLACE UNTIL
HIGHAY INFRASTRUCTURE IS IN PLACE—

SEE ATTACHED

Please continue on a separate sheet if necessary

**Please note:** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

 $\sqrt{}$ 

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

#### **Dear Sirs**

This continuation sheet is further to my Representation/Comment form. I find it necessary to use this continuation sheet because I find the format of the Comment Form too complicated and misleading to complete within the small spaces allocated.

I think that the Local Plan Submission Draft is not legally compliant, sound or complies with the duty to cooperate and is certainly not justified or consistent with the national policy for the following reasons:

I believe that the Plan is not legally compliant because:

As late as 12<sup>th</sup> December 2018 the Council Cabinet meeting stated that the Statement of Common Ground was still being prepared. Obviously this was too late for the preparation of the Local Plan and therefore the requirements of the plan making PPG para 054 have not been met. Not surprisingly it is lacking in evidence to demonstrate that it satisfies the Duty to Cooperate on the matters of Employment Land, Remediation of Brownfield land, Transport and Traffic, (including road infrastructure) and local amenities.

I believe that St Helens Council have not proved "exceptional circumstances" for removing land from Green Belt and I believe that the plan is not positively prepared, justified, effective or consistent with the National Planning Policy.

The Plan is not positively prepared because there is little or no evidence of agreements with other areas and by releasing Green Belt land unnecessarily; the plan does not achieve sustainable development.

No statement is available on how the Council has fulfilled it's Duty to Cooperate. The Council are proposing significant development without showing how it will impact elsewhere.

#### **Duty to Cooperate.**

The economic growth predictions, not just for St Helens, but for the neighbouring boroughs within the Liverpool City Region (LCR) are based on the flawed methodology nationally using NPPF Guidelines, ONS statistics (2016) instead of (2018) which do not take into account differing regional requirements. (this has recently been debated in Government).

This has resulted in a "free for all" within the LCR with many houses being built needlessly, without any apparent collusion between boroughs. The latest plans by Lancashire County Council proposes the construction of 6000 houses 5 miles to the north of St Helens. These dwellings are contiguous to the A570 Rainford bypass and although they straddle the M58 motorway it is obvious that there will be peak time pressures on Windle Island as commuters seek access to west Manchester and east Liverpool as up to 10000 cars (6000 x 1.8 national average car per household) could be involved.

St Helens MBC is a member of the Liverpool City Partnership and as such is privy to the planning issues being passed as the programme for the Northern Powerhouse is rolled out but continues to push ahead to please the developers, ignoring the views of the local residents. There is no obvious cooperation to provide an integrated transport plan between St Helens, Knowsley, Wigan or Warrington. Any employees would need to travel by private cars to the new business parks as there is no existing public transport or any published plans for the future.

#### **Employment Land**

The Oxford Economics transformational Growth forecasts (2016) are all quoted as being critical in informing assumptions about industry growth and the demand for employment land but are nowhere to be accessed despite formal enquiries being made to SHBC and the Liverpool City Region.

The Employment Land Needs Study addendum report (January 2109) states that "this modelling had input from St Helens Council in regards to promoted major development projects being considered in the preparation of the Local Plan Preferred Options, being focused on logistics and warehousing schemes, including potential Green Belt sites around Haydock, west of Omega and Parkside West and East"

If this statement is true, it means that the Council itself set the criteria for transformational growth including the use of Green Belt land is a subjective and aspirational scenario and not an objectively based needs assessment of economic and market trends.

It follows that SHBC have directly informed a set of economic aspirations which have become joint planning policy. For this reason I believe that the plan has not been positively prepared.

SHMBC must be aware of the extent of the aspirational numbers of jobs being promised by developers without any hard evidence of these jobs materialising eg The Amazon warehouse at Florida Farm promises many jobs, but the trade press heralds Amazon's recent acquisition of robotisation software to ensure efficiency and cost savings by reducing workplace numbers. I do not believe that the actual jobs created will match the number of jobs promised.

I am dismayed at the number of giant warehouses springing up along the A580, each needing HGVs to supply stock for disbursement and HGVs and LGVs to distribute to final destinations. I fear that many of these sites will fail to reach their planned potential, leaving a legacy of derelict sheds and wasted unoccupied land.

#### **Brownfield sites**

St Helens Councillors state that the cost of cleaning up the Brownfield sites of St Helens would cost £40 million. This is without any apparent investigation into the feasibility of cleaning Brownfield sites as they are brought onto the Brownfield register. I have not seen any report of the Council's effort to bid for these monies, successful or not.

The Council, in conjunction with Liverpool City Combined Authority have no policy for bringing unsuitable sites outside the Brownfield register back into use. It is not reasonable to assume that sites cannot be made available within the 15 year safeguarded plan period.

#### **Traffic Issues**

The impending effects of the Superport at Bootle expansion means that there will be an explosion of HGV traffic to service the burgeoning warehousing between the M57 and the M6.

Already these units are advertising **DIRECT** access for HGVs to Liverpool and Manchester by using the A580 and passing Windle Island in both directions.

The Council's plan to build 1027 new homes on 8H9 states that there will be an access road onto the A580 by rerouting Houghtons Lane. The stretch of the A580 between Windle Island and the junction of Blindfoot Road only is 1.4 miles, with 3 intersections onto a busy crowded freeway. This area has seen 3 fatalities recently and an estimated 1800 extra cars at peak times is not sustainable.

#### Windle Island

The Local Infrastructure Delivery Plan (IDP) also states that there will be access to the Junction of Bleak Hill road and Rainford Road. Given that the new "improvements" to Windle Island include a forced exit from Tesco garage/Costa coffee onto Rainford road for traffic turning northwards along the A570 (Rainford bypass). In the opinion of the local residents this is sheer stupidity and will lead to even more complications at this junction.

This plan promotes unsustainable traffic growth that will not satisfy the NPPF (2018) guidelines (para109) - "Development should only be prevented or refused if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be **severe**"



This is echoed in the Council's own proposed submission draft (LP01 sec 4.25) which includes the following:

"3. New development will only be permitted if it would: a) maintain the safe and efficient flow of traffic on the surrounding highway network. Development proposals will not be permitted where vehicle movements would cause severe harm to the highway network b) be located and designed to enable a suitable level of access (having regard to the scale and nature of the proposal) to existing and / or proposed public transport services."

To propose a housing development in the face of these obstacles shows a clear disregard for NPPF guidelines regarding the plan being positively prepared and it is clearly not sustainable without a major revision of highways infrastructure.



Community Infrastructure: Currently this area has a much reduced and inadequate bus service with a new health centre built nearly a mile away and not accessible by bus. Older residents and non drivers are forced to use taxis to access this amenity or to visit local supermarkets. Because of these difficulties, many non drivers and disabled residents have to shop online, thus bringing more delivery vans into the existing local area. The idea of building a further 1100 houses is totally unsustainable.



I feel that a suitable alternative to this plan would be to maintain the farming activity, thus protecting our food supply (especially in the face of Brexit uncertainty), Plant wildflower corridors within the crops and deciduous trees around the perimeter of this land, providing a carbon sink to offset the effects of the increased pollution that the extra traffic will bring.

Taking into account all these reasons, I feel that the Latest Plan Submission should be rejected on the grounds that it cannot accommodate more houses with the present infrastructure and the land should be better used for environmental protection.

Yours Sincerely

D A Oxford

39 Windlebrook Crescent, St Helens WA10 6DY

Peter 245

EL0277

D-LPAOL



Objections to the St Helens Council Local Plan 2020 - 2035

to: planningpolicy 08/05/2019 21:39

Planning Section.

I wish to submit the following objections relating to the HA7 proposal of the St Helens Borough Council Local Plan 2020 to 2035.

(I have been unable to use the form available on the planning web site as it is unfit for purpose.)

I wish to object specifically to Proposal sub part (Removal of land off Vista Road from Green Belt for future development.)

My main objections to removing proposed area HA7 from Green Belt are as follows:

A) Local health infrastructure is crumbling around the HA7 proposed development area. It already takes me 3 weeks to get a GP appointment. Our local clinic has closed and been redeveloped. It is no longer possible to find a space on Newton Cottage Hospital car park on most days due to overdevelopment of our town.

Considering recent and on-going massive increases in housing development in our area, the town becoming increasingly overcrowded and congested which affects our quality of life.

- B) Traffic congestion and pollution at peak times on VISTA road has already reached intolerable levels. The HA7 proposal would further overload the area and have an adverse effect and make it worse.
- C) Domestic water pressure in the surrounding areas to proposal HA7 already regularly drops below satisfactory levels. It is not just the responsibility of the utility companies but also that of the Local council planning strategy.
- D) Further destruction of Green Belt land for housing development when several hundreds of houses have already been built in the local area.

Regards

Malcolm Paget 66 Highmarsh Crescent Newton le willows Merseyside WA12 9WF



Virus-free. www.avast.com





# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

(For official use only)

Please also read the Representation Form Guidance Note that is available with this form, or online at: www.sthelens.gov.uk/localplan

Please ensure the form is returned to us by no later than 5pm on Wednesday 13th March 2019. Any comments received after this deadline cannot be accepted.

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

1 0 MAY 2019

### PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

| Your Details (we will correspond via your agent)   | 2. Your Agent's Details (if applicable)  |
|--|--|
|  | Title:   |
|  |  |
| The state of the s | First name:  |
|  | Last Name:   |
| Organisation/company:  | Organisation/company:  |
|  | Address:   |
| ST HELENS  |  |
|  | Postcode:  |
|  | Tel No:  |
|  | Mobile No:   |
|  | Email:   |
|  | Lilian.  |
| Signature:   | Date: 12/3/19 -  |
| Please be aware that anonymous forms cannot be considered you MUST include your details above.   | accepted and that in order for your comments to be   |
| Would you like to be kept updated of future stage (namely submission of the Plan for examination, puadoption of the Plan)  | ges of the St Helens Borough Local Plan 2020-2035? ublication of the Inspector's recommendations and |
| Yes (via email)  | ☐ No   |
| Please note - email is the Council's preferred met   | hod of communication. If no email address is provided,   |

we will contact you by your postal address.

#### RETURN DETAILS

Please return your completed form to us by no later than 5pm on Wednesday 13th March 2019 by:

post to:

Local Plan St.Helens Council Town Hall Victoria Square St Helens

**WA10 1HP** 

or by hand delivery to:

Ground Floor Reception St.Helens Town Hall

(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

### **FURTHER INFORMATION**

If you require further information please see the FAQs on our website: www.sthelens.gov.uk/localplan

If you still need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk

Telephone: 01744 676190

#### **NEXT STEPS**

The Council intends to submit the St. Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

#### **DATA PROTECTION**

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: www.sthelens.gov.uk/localplan

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

### **PART B - YOUR REPRESENTATION**

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

| Policy      | Paragraph/                                     | Policies                                       | Sustainability   | Habitats                            |
|-------------|--|--|--|-------------------------------------|
| olicy       | diagram<br>table                               | Мар  | Appraisal/<br>Strategic<br>Environmental<br>Assessment | Regulations<br>Assessment           |
|             | ments (please name<br>and relevant part/secti  | on)  |  |                                     |
| 4. Do you o | consider the St Helen<br>ead the Guidance note | s Borough Local le<br>for explanations of      | Plan 2020-2035 is:<br>f Legal Compliance and the       | ne Tests of Soundness               |
| Legally Cor | mpliant?                                       |  | Yes No   |                                     |
| Sound?      |  |  | Yes No   |                                     |
| Complies v  | vith the Duty to Coope                         | rate   | Yes ☑ No   |                                     |
| Please tick | as appropriate                                 |  |  |                                     |
| Please re   |  | for explanations o                             | f the Tests of Soundness                               |                                     |
| Justified?  | repareus                                       | <u>⊠</u>                                       |  |                                     |
| Effective?  |  | [X]  | e ·  |                                     |
|             | with National Policy?                          | N  |  |                                     |
|             |  |  | ocal Plan is not legally co                            |                                     |
| or fails t  | sh to support the leg                          | ity to cooperate. <u>P</u><br>al compliance or | Please be as precise as p                              | ossible.                            |
| or fails to | sh to support the leg box to set out your o    | al compliance or comments.                     | Please be as precise as p                              | ossible. Plan, please also Pur Wits |

Has Nois Runs,

| compliant or sound, having regard to the marelates to soundness (NB please note that incapable of modification at examination).  | onsider necessary to make the Local Plan legally matter you have identified at 6. above where this any non-compliance with the duty to cooperate is You will need to say why this modification will make It will be helpful if you are able to put forward your or text. Please be as precise as possible. |
|--|--|
|  |  |
|  | Please continue on a separate sheet if necessary   |
| information necessary to support/justify the repressibility not normally be a subsequent opportunity to representation at the publication stage.  After this stage, further submissions will be on and issues he/she identifies for examination. | uccinctly all the information, evidence and supporting sentation and suggested modification, as there make further representations based on the original only at the request of the Inspector, based on matters ation; do you consider it necessary to participate at                                      |
| No, I do not wish to participate at the oral examination   |  |
| 9. If you wish to participate at the oral part of this to be necessary:  | the examination, please outline why you consider   |
|  |  |
|  |  |
| Please note the Inspector will determine the most  | t appropriate procedure to adopt to hear those who have  |

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.





# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

(For official use only)

Please also read the Representation Form Guidance Note that is available with this form, or online at:

Please ensure the form is returned to us by no later than 5pm on Wednesday 13th March 2019. Any comments received after this deadline cannot be accepted.

This form has two parts;

Part A - Personal Details

www.sthelens.gov.uk/localplan

Part B - Your Representation(s)

1 0 MAY 2019

### PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

| Your Details    (we will correspond via your agent)   | 2. Your Agent's Details (if applicable)  |
|---|--|
|   | Title  |
| Title:  | Title:   |
| First Name: TELLERA   | First name:  |
| Last Name: 1 A RUCR.  | Last Name:   |
|   | Organisation/company:  |
| Address: 13 Douglas Tous  | Address:   |
| Postcode: WA9 45Z.  | Postcode:  |
|   | Tel No:  |
|   | Mobile No:   |
|   | Email:   |
| Signature:  | Date: 13/3/19  |
| considered you MUST include your details at   |  |
| Would you like to be kept updated of futur<br>(namely submission of the Plan for examinati<br>adoption of the Plan) | re stages of the St Helens Borough Local Plan 2020-2035? ion, publication of the Inspector's recommendations and |
| Yes (via email)   | ☐ No   |
| Please note - email is the Council's preferred  | d method of communication. If no email address is provided,  |

## **PART B - YOUR REPRESENTATION**

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

| Policy  | Paragraph/<br>diagram<br>table  | Policies<br>Map                   | Sustainability Appraisal/ Strategic Environmental Assessment | Habitats<br>Regulations<br>Assessment |
|---|---|-----------------------------------|--|---------------------------------------|
|   | uments (please name<br>and relevant part/section)   |                                   |  |                                       |
|   |   |                                   |  |                                       |
| 4. Do you<br>Please r                                 | consider the St Helens B<br>ead the Guidance note for   | orough Local I<br>explanations of | <b>Plan 2020-2035 is:</b><br>f Legal Compliance and th       | ne Tests of Soundness                 |
| Legally Co  | empliant?   |                                   | Yes 📝 No   |                                       |
| Sound?  |   |                                   | Yes No   |                                       |
|   | with the Duty to Cooperate  | ,                                 | Yes 🗹 No   |                                       |
|   | c as appropriate  |                                   |  |                                       |
| Positively I<br>Justified?<br>Effective?<br>Consisten | Prepared? t with National Policy?   |                                   |  |                                       |
| or fails If you w use this                            | give details of why you of to comply with the duty rish to support the legal is box to set out your con | compliance or ments.              | Please be as precise as p soundness of the Local             | Man, please also                      |

| relates to soundness (NB please note that a incapable of modification at examination). Y             | nsider necessary to make the Local Plan legally atter you have identified at 6. above where this any non-compliance with the duty to cooperate is You will need to say why this modification will make t will be helpful if you are able to put forward your text. Please be as precise as possible. |
|--|--|
| •  | Please continue on a separate sheet if necessary   |
| Please note: your representation should cover such formation necessary to support/justify the repres | ccinctly all the information, evidence and supporting sentation and suggested modification, as there   |
| vill not normally be a subsequent opportunity to me presentation at the publication stage.           | nake further representations based on the original   |
|  | ly at the request of the Inspector, based on matters   |
|  | ation; do you consider it necessary to participate at ngs in public)   |
| No, I do not wish to participate at the oral examination   | Yes, I wish to participate at the oral examination   |
| 9. If you wish to participate at the oral part of  | the exemination places outline why you consider  |
| this to be necessary:  | the examination, please outline why you consider   |
|  | the examination, please outline why you consider   |
|  | the examination, please outline why you consider   |
|  | the examination, please oddine why you consider  |
|  | the examination, please oddine why you consider  |
|  | the examination, please outline why you consider   |

Thank you for taking the time to complete and return this response form.

# RO1369

Ref: LPSD



# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

(For official use only)

Please also read the Representation Form Guidance Note that is available with this form, or online at: www.sthelens.gov.uk/localplan

Please ensure the form is returned to us by no later than 5pm on Wednesday 13th March 2019. Any comments received after this deadline cannot be accepted.

This form has two parts;

1. Your Details

Part A - Personal Details

Part B - Your Representation(s)

2. Your Agent's Details (if applicable)

## **PART A - YOUR DETAILS**

(we will correspond via your agent)

Please note that you must complete Parts A and B of this form.

| Title:  | Mſ  | Title:  |
|---|---|---|
| First Name:   | (ed   | First name:   |
| Last Name:  | Parkes  | Last Name:  |
| Organisation/co                                     | ompany:   | Organisation/company:   |
| Address: 297  | 7, Liverpoo7 Road<br>11 Haydock                               | Address:  |
| Postcode:   | WALL OUN  | Postcode:   |
| Tel No:   |   | Tel No:   |
| Mobile No.  | 1   | Mobile No:  |
| Email:  |   | Email:  |
| Signature:  |   | Date: 12:3:19   |
| considered you                                      | MUST include your details                                     | above.  |
| Would you like<br>(namely submis<br>adoption of the | sion of the Plan for examina                                  | ure stages of the St Helens Borough Local Plan 2020-2035? ation, publication of the Inspector's recommendations and |
| Yes (via ema  | ail)  | ☑ No  |
| Please note - e<br>we will contact                  | email is the Council's preferr<br>you by your postal address. | red method of communication. If no email address is provided,   |

### **RETURN DETAILS**

Please return your completed form to us by no later than 5pm on Wednesday 13th March 2019 by:

post to:

Local Plan

St. Helens Council

**Town Hall** 

Victoria Square

St Helens WA10 1HP

or by hand delivery to:

Ground Floor Reception

St. Helens Town Hall

(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

### **FURTHER INFORMATION**

If you require further information please see the FAQs on our website: www.sthelens.gov.uk/localplan

If you still need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk

Telephone: 01744 676190

### **NEXT STEPS**

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

### DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: www.sthelens.gov.uk/localplan

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

## **PART B - YOUR REPRESENTATION**

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

| Poticy LPA 05.1 [2HA] LPC 05   | diagram  | Policies<br>Map  | Sustainability Appraisal/ Strategic Environmental Assessment  | Habitats<br>Regulations<br>Assessment   |
|--|--|--|---|---|
|  | nts (please name<br>relevant part/section  | on)  |   |   |
|  |  |  | Plan 2020-2035 is:<br>f Legal Compliance and th   | ne Tests of Soundness   |
| Legally Compli   | ant?   |  | Yes No  | don't know  |
| Sound?   |  |  | Yes No  |   |
| Complies with  | the Duty to Cooper   | ate  | Yes No  |   |
| Please tick as a   | appropriate  |  | * *   |   |
| Positively Preparation Property Preparation Preparatio |  | \<br>\<br>\<br>\<br>\  |   |   |
| Consistent with  | National Policy?   | <b>✓</b>   |   |   |
| or fails to co   | omply with the dut<br>to support the lega<br>to set out your c                                 | ty to cooperate. It<br>al compliance or<br>comments.   | cal Plan is not legally co<br>Please be as precise as po<br>soundness of the Local I  | ossible.<br>Plan, please also   |
| unsound as in economic Zon air pollution on existing supporting environment not are maintal are mainta | t is irresponsible of the A580 and traffic congest amenities for the proportion of appropriate | e to build a to Liverpool - Me ever-increasing Clipsley cilities. It is ture etc., produced already for use. | ousing estate within the inchester Corridor with a traffic [mainly heavy lane - Blackbrook]; of investigation of the point when exist sale are ignored. The | he ever-expanding. The aftendant now I he aftendant now I have existing naturally housing lies unhave must be site. |

|                      | THE PARTY OF THE P |  |
|----------------------|--|--|
| relatince the sug    | npliant or sound, having regard to the mates to soundness (NB please note that apable of modification at examination).  Local Plan legally compliant or sound.  I gested revised wording of any policy o   | onsider necessary to make the Local Plan legally matter you have identified at 6. above where this any non-compliance with the duty to cooperate is You will need to say why this modification will make It will be helpful if you are able to put forward your or text. Please be as precise as possible. |
| bour<br>brow<br>poll | nake the LP cound, the Anthorndanies and take note of front freld sites, existing land attom, facilities; as in  | ACTS like traffic congestion, use of up for sale, the natural environment, act fairly and responsibly.   |
|                      |  | Please continue on a separate sheet if necessary   |
|                      |  | uccinctly all the information, evidence and supporting   |
| After thand iss      | ues he/she identifies for examination.   | ation; do you consider it necessary to participate at ings in public)  |
| <b>✓</b>             | No, I do not wish to participate at the oral examination   | Yes, I wish to participate at the oral examination   |
| 9. If yo             | ou wish to participate at the oral part of to be necessary:  | the examination, please outline why you consider   |
|                      |  |  |
|                      |  |  |
|                      |  |  |
|                      |  |  |
|                      |  |  |

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.

# RO1370



# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

(For official use only)

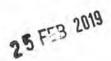
Please also read the Representation Form Guidance Note that is available with this form, or online at: www.sthelens.gov.uk/localplan

Please ensure the form is returned to us by no later than 5pm on Wednesday 13th March 2019. Any comments received after this deadline cannot be accepted.

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)



### PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

| Your Details (we will correspond via your agent)  | 2. Your Agent's Details (if applicable)   |  |  |  |
|---|---|--|--|--|
| Title: 125  | Title:  |  |  |  |
|   | First name:   |  |  |  |
|   | Last Name:  |  |  |  |
|   | Organisation/company:   |  |  |  |
| Address: 436 GARSWOOD ROAD  | Address:  |  |  |  |
|   |   |  |  |  |
|   | Postcode:   |  |  |  |
| Tel No:   |   |  |  |  |
| Mobile No:  | Mobile No:  |  |  |  |
| Email:  | Email:  |  |  |  |
| Signature:  | Date: 22 · 2 · 1 · 2  |  |  |  |
| Please be aware that anonymous forms cannot be acconsidered you MUST include your details above.  | cepted and that in order for your comments to be  |  |  |  |
| 그 하는 종이 이번 가셨다면 되는 이번에서 하는 바람이 되었다면 하다. 그 아이들이 때문에  | s of the St Helens Borough Local Plan 2020-2035? ication of the Inspector's recommendations and |  |  |  |
| Yes (via email)   | ☐ No  |  |  |  |
| Please note - email is the Council's preferred method we will contact you by your postal address. | d of communication. If no email address is provided,  |  |  |  |

### RETURN DETAILS

Please return your completed form to us by no later than 5pm on Wednesday 13th March 2019 by:

post to:

Local Plan

St. Helens Council

Town Hall

Victoria Square

St Helens WA10 1HP

or by hand delivery to:

Ground Floor Reception St. Helens Town Hall

(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

### **FURTHER INFORMATION**

If you require further information please see the FAQs on our website: www.sthelens.gov.uk/localplan

If you still need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk

Telephone: 01744 676190

### **NEXT STEPS**

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

### DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: www.sthelens.gov.uk/localplan

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

### **PART B - YOUR REPRESENTATION**

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

|  | 1                               |   | an does this repre  |   | Tour new Trans   |
|--|---------------------------------|---|---|---|--|
| Policy                                 | LPAGS<br>SITE<br>IHA            | Paragraph/<br>diagram<br>table                            | Policies<br>Map   | Sustainability Appraisal/ Strategic Environmental Assessment                                | Habitats Regulations Assessment                                  |
|  |                                 | ts (please name<br>relevant part/secti                    | on)   |   |  |
|  |                                 |   |   | Plan 2020-2035 is:<br>Legal Compliance and the  | ne Tests of Soundness  |
| Legally                                | / Complia                       | int?  |   | Yes No  |  |
| Sound                                  | ?                               |   |   | Yes 🗸 No  |  |
| Compl                                  | ies with th                     | ne Duty to Cooper   | rate 🔲  | Yes No  |  |
| Please                                 | tick as a                       | ppropriate  |   |   |  |
| Plea                                   | se read the<br>ely Prepa<br>ed? | ne Guidance note  |   | because it is not:<br>the Tests of Soundness  |  |
|  |                                 | National Policy?  | V   |   |  |
| or fa                                  | u wish to                       | mply with the du  | ty to cooperate. <u>P</u><br>al compliance or s             | cal Plan is <u>not legally co</u><br>lease be as precise as pos<br>soundness of the Local I | ossible.   |
| 175<br>HAS<br>PEG<br>URE<br>PEI<br>REI | POPUE<br>OFTI<br>SAN R<br>25UC  | CLINED SI<br>COMING E<br>HE PURPOS<br>EGENERA<br>TAND OTH | NCE 1981.<br>POM?<br>ES OF THE<br>TION BY ENCY<br>FER LAND, | WHERE ARE AU<br>GREENBELT IS<br>OURAGING THE  | OF ST HELENS THE EXTRA TO ASSISTIN FRECYCLING OF BELT DOESNOTION |

6. DETAILS OF WHY YOU CONSIDER THE LOCAL PLANT IS NOT LEGIALLY CONFLIANT ORIS UNBOUND.

HOUSING IN THIS AREA ISN'T SUSTAINABLE

DUE TO LACK OF SCHOOL PLACES, DECTOR'S

SURGERIES, BUS ROUTES, PARKING AT THE

TRAIN STATION IS LIMITED AND PEOPLE WHO USE

THE TRAINS ARE PARKING IN SCHOOL LANE,

STRANGE ROAD, STATION ROAD AND VICTORIA

ROAD ALL DAY CAUSING AN OBSTRUCTION

FOR BUSES AND OTHER ROAD USERS

THE USE OF CARS IS BEING ENCOURAGED

DUE TO LACK OF FACILITIES.

THE ALCESS TO THE SITE ON EITHER
BILLINGE ROAD OF GARSWOOD ROAD IS
NOT ADEQUATE DUE TO NARROW ROAD AND
THE AMOUNT OF TRAFFIC ALREADY USING
THESE ROADS. THERE A LOT OF WALKERS
AND IT IS GETTING REALLY BAD CROSSING
THE ROADS DUE TO THE INCREASING
HOUNT OF TRAFFIC. ANY NECESSARY
HIGHWAYS WORK MUST BE FUNDED BY
THE DEVELOPER AND NOT THE COUNCIL
TAX PAYER.

THERE IS NO STATEMENT OF COUND GROUND WITH NEIGHBOURING AUTHORITIES.

NB CHILDREN WITH ASTHMA WILL SURFER MOST

DUE TO POLLUTION. ONE CHILD HAS DIED DUE TO THIS,

AND IT IS ONE CHILD TOO MANY OVER DNG HILLION

IN THE UK HAVE ASTHMA: ASSUMING EACH HOUSE

HAS TWO ADULTS AND THEY BOTH HAVE A CAR THEN

THAT IS OVER FOUR HUNDRED CARS ADDING TO THE

POLLETION AND EXTRA TRAFFIC

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

PROM THE NEW DEVELOPMENT WOULD IT BE BETTER
TO SPREAD THE BUILDING OF HOUSES CREATING
LITTLE VILLAGES INSTEAD OF ESTATES WHICH ARE
TOO BIG. THERE ARE TWO PLOTS OF LAND ON
BILLINGE ROAD WHERE HOUSES HADE BEEN PULLED
DOWN AND ONE ON LEYLAND GREEN ROAD, LOOK FOR
OTHER PLOTS. PEASE KEER OUR CREEKELT AS WE
WILL NEED THIS FOR FARMING GIVE INCENTIVES
WILL NEED THIS FOR FARMING GIVE INCENTIVES
TO BUILD ERS FROM FOR BROWN FIELD CORS CONTINUE ON a separaporter CONTINUA

**Please note:** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

| our representation is seeking a modifica oral part of the examination? (the hearing | ntion; do you consider it necessary to participate at ngs in public) |
|---|--|
| No, I do not wish to participate at the oral examination                            | Yes, I wish to participate at the oral examination                   |

| 9. If you wish to participate | at the oral part of the examinat | tion, please outline why you consider |
|-------------------------------|----------------------------------|---------------------------------------|
| this to be necessary:         |                                  |                                       |

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.



# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

(For official use only)

Please also read the Representation Form Guidance Note that is available with this form, or online at: www.sthelens.gov.uk/localplan

Please ensure the form is returned to us by no later than 5pm on Wednesday 13th March 2019. any comments received after this deadline cannot be accepted.

This form has two parts:

Part A - Personal Details

Part B - Your Representation(s)

25 FEB 2019

### PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

| Your Details    (we will correspond via your agent)                                 | 2. Your Agent's Details (if applicable)  |  |  |  |
|---|--|--|--|--|
|   | Title:   |  |  |  |
|   | First name:  |  |  |  |
|   | Last Name:   |  |  |  |
|   | Organisation/company:  |  |  |  |
|   | POROAddress:   |  |  |  |
|   | DIGMN  |  |  |  |
|   | Postcode:  |  |  |  |
|   | Tel No:  |  |  |  |
| Mobile No:  | Mobile No:   |  |  |  |
| Email:  | Mobile No:   |  |  |  |
| Signature:  | Date: 22 · 2 · 19  |  |  |  |
| Please be aware that anonymous forms cannonsidered you MUST include your details ab | ot be accepted and that in order for your comments to be pove.   |  |  |  |
|   | e stages of the St Helens Borough Local Plan 2020-2035? on, publication of the Inspector's recommendations and |  |  |  |
| Yes (via email)   | □ No   |  |  |  |
| we will contact you by your postal aggress  | d method of communication. If no email address is provided.  |  |  |  |

## PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before vov complete ::

| 3. 10 Willer par                            | t of the Local Pla                                       | an does this r                           | epresent                                     | ation relate?   |   |
|---|--|--|--|---|---|
| LPSO<br>LPA IHS                             | Paragraph/<br>diagram<br>table                           | Policies<br>Map                          | IHS  | Sustainability Appraisal/ Strategic Environmental Assessment          | Habitats Regulations Assessment                 |
|   | its (please name<br>relevant part/sect                   | ion) l                                   |  |   |   |
|   | ider the St Helen  |  |  |   | ne Tests of Soundness                           |
| Legally Complia                             | ant?   |  | √ Yes  | □ No  |   |
| Sound?                                      |  |  | Yes  | ✓ No  |   |
| Complies with t                             | he Duty to Coope   | rate                                     | ☐ Yes  | □ No  |   |
| riease tick as a                            | appropriate  |  |  |   |   |
|   |  |  |  | Tests of Soundness  |   |
|   | National Policy?   |  | N  |   |   |
| or fails to co                              | omply with the du  | ity to coopera<br>gal complianc          | te. Pleas                                    | Plan is not legally co<br>e be as precise as p<br>idness of the Local |   |
| HAS DE PEOPLE ONE OFT URBAN E PEREUR PEREUR | CLINEDS<br>COMINGE<br>HE PURPOS<br>LEGENERA<br>CT AND OT | INCE 199<br>FROM?<br>SES OF<br>TION BY E | ES, TH<br>81, W<br>THE G<br>TN COU<br>ND, US | E POPULATION HERE ARE AL REENBELT IS RAGING THE                       | TO ASSISTIN<br>FRECYCLING OF<br>BELT DOES NOTIN |

9 15 NOT LEGALLY COMPLIANT ORIS UNBOUND. CONTINUED

HOUSING IN THIS AREA ISN'T SUSTAINABLE DUE TO LACK OF SCHOOL PLACES, DECTOR'S SURGERIES, BUS ROUTES, PARKING AT THE TRAIN STATION IS LIMITED AND PEOPLE WHO USE THE TRAINS ARE PARKING IN SCHOOL LANE, STRANGE ROAD, STATION ROAD AND VICTORIA ROAD ALL DAY CAUSING AN OBSTRUCTION FOR BUSES AND OTHER ROAD USERS THE USE OF CARS IS BEING ENCOURAGED DUE TO WACK OF FACILITIES

THE ACCESS TO THE SITE ON EITHER BILLING F ROAD OF LEYLAND GREEN ROAD IS NOT ADEQUATE DUE TO NARROW ROAD AND THE AMOUNT OF TRAFFIC HUREADY USING THESE ROADS. THERE A LOT OF WALKERS AND IT IS GETTING REALLY BAD CROSSING THE ROADS DUE TO THE INCREASING +MOUNT OF TRAFFIC HNY NECESSARY HIGHWAYS WORK MUST BE FUNDED BY THE DEVELOPER AND NOT THE COUNCIL TAX DAYER

THERE IS NO STATEMENT OF COMMON GROUND DITH NEIGHBOURING AUTHORITIES

NB CHILDREN WITH ASTHMA WILL SUFFER MOST OVER ONE MILLION CHILDREN HADE ASTHMA IN THE UK ASSUMING EACH HOUSE IS OCCUPIED BY TWO PEOPLE AND EACH HAVE A CAR THEN THAT IS OVER FOUR HUNDRED CARS ADPING TO THE POLLUTION.

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

DUE TO POLLYTION AND EXTRA TRAFFIC COMINECE FROM THE NEW DEVELOPMENT WOULD IT BE BETTER TO SPREAD THE BUILDING OF HOUSES CREATING LITTLE VILLAGES INSTEAD OF ESTATES WHICH ARE TOO BIG. THERE WHE TWO PLOTS OF LAND OTH BILLINGE ROAD WHERE HOUSES HADE BEEN PULLED DOWN AND ONE ON LEYLAND GREEN ROAD, LOOK FOR OTHER PLOTS, PEASE KEER OUR CHEERSELT AS WE WILL NEED THIS FOR FARMING

Please continue on a separate sheet if necessary I

**Please note:** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the origina representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

No, I do not wish to participate at the oral examination

I Yes. I wish to participate at the oral

1 examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note the inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.

# RO1371



# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

0 1 MAR 2018

(For official use only)

Please also read the Representation Form Guidance Note that is available with this form, or online at: www.sthelens.gov.uk/localplan

Please ensure the form is returned to us by no later than 5pm on Wednesday 13th March 2019. Any comments received after this deadline cannot be accepted.

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

01 MAR 2019

### PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

| Your Details     (we will correspond via your agent)  | 2. Your Agent's Details (if applicable)  Title:   |  |  |  |
|---|---|--|--|--|
|   |   |  |  |  |
| First Name: BRIAN   | First name:   |  |  |  |
| Last Name: PARKINSON .  | Last Name:  |  |  |  |
|   | Organisation/company:   |  |  |  |
| Address: 566 CARSWOOD ROAD<br>NORTH ASHTON, NR. WIGAN   | Address:  |  |  |  |
| Postcode: WN4 OX A  | Postcode:   |  |  |  |
|   | Tel No:   |  |  |  |
| Mobile No:  | Mobile No:  |  |  |  |
| Email:  | Email:  |  |  |  |
| Signature:  | Date: 26H FeB 2019  |  |  |  |
| Please be aware that anonymous forms cannot be a considered you MUST include your details above.                                | accepted and that in order for your comments to be  |  |  |  |
| Would you like to be kept updated of future stag<br>(namely submission of the Plan for examination, pu<br>adoption of the Plan) | les of the St Helens Borough Local Plan 2020-2035? blication of the Inspector's recommendations and |  |  |  |
| Yes (via email)   | ☐ No  |  |  |  |
| Please note - email is the Council's preferred meth we will contact you by your postal address.                                 | od of communication. If no email address is provided,   |  |  |  |

### RETURN DETAILS

Please return your completed form to us by no later than 5pm on Wednesday 13th March 2019 by:

post to:

Local Plan

St. Helens Council

Town Hall

Victoria Square

St Helens

WA10 1HP

or by hand delivery to:

Ground Floor Reception St. Helens Town Hall

(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

### FURTHER INFORMATION

If you require further information please see the FAQs on our website: www.sthelens.gov.uk/localplan

If you still need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk

Telephone: 01744 676190

### **NEXT STEPS**

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

### DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: www.sthelens.gov.uk/localplan

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

## , PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

| Policy Paragram   |                           |  |                                       |
|---|---------------------------|--|---------------------------------------|
| table HA  |                           | Sustainability Appraisal/ Strategic Environmental Assessment | Habitats<br>Regulations<br>Assessment |
| Other documents (please document and relevant pa                      |                           |  |                                       |
|   | it Helens Borough Local F |  | e Tests of Soundness                  |
| Legally Compliant?  | <b>\(\sigma\)</b>         | Yes No   |                                       |
| Sound?  |                           | Yes No   |                                       |
| Complies with the Duty to   | Cooperate                 | Yes ☑ No   |                                       |
| Please tick as appropriate  | 9                         |  |                                       |
| Positively Prepared? Justified? Effective? Consistent with National F | Policy?                   |  |                                       |
| Justified?<br>Effective?<br>Consistent with National F                | Policy?                   | al Diam is not becally as                                    |                                       |

| 7 | 7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible. |
|---|---|
|   | suggested revised wording of any policy or text. Please be as precise as possible.  |

Delete this land from the proposed removal of the green belt.

Please continue on a separate sheet if necessary

**Please note:** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)



No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.



# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD BLOS HAM 1 0

(For official use only)

Please also read the Representation Form Guidance Note that is available with this form, or online at: www.sthelens.gov.uk/localplan

Please ensure the form is returned to us by no later than 5pm on Wednesday 13th March 2019. Any comments received after this deadline cannot be accepted.

This form has two parts:

Part A - Personal Details

Part B - Your Representation(s) 2019

### PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

<sup>1</sup> view at http://www.legislation.gov.uk/ukpga/2004/5/contents

| Your Details    (we will correspond via your agent)  | 2. Your Agent's Details (if applicable)  |
|--|--|
|  | Title:   |
| First Name: BRIAN  | First name:  |
| Last Name: PARKINSON .   | Last Name:   |
|  | Organisation/company:  |
| Address: 566 GARSWOOD ROAD<br>NORTH ASHTON NR. WIGAN   | Address:   |
| Postcode:  | Postcode:  |
|  | Tel No:  |
|  | Mobile No:   |
| Email:   | Email:   |
| Signature:   | Date: 2Ct Feb 2019   |
| Please be aware that anonymous forms cannot be considered you MUST include your details above. | e accepted and that in order for your comments to be   |
|  | ages of the St Helens Borough Local Plan 2020-2035? Sublication of the Inspector's recommendations and |
| Yes (via email)  | □ No   |
| Please note - email is the Council's preferred met we will contact you by your postal address. | thod of communication. If no email address is provided,  |

#### RETURN DETAILS

Please return your completed form to us by no later than 5pm on Wednesday 13th March 2019 by:

post to:

Local Plan

St. Helens Council

Town Hall Victoria Square St Helens WA10 1HP

or by hand delivery to:

Ground Floor Reception St. Helens Town Hall

(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

### **FURTHER INFORMATION**

If you require further information please see the FAQs on our website: www.sthelens.gov.uk/localplan

If you still need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk

Telephone: 01744 676190

### **NEXT STEPS**

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination, All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

### DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: www.sthelens.gov.uk/localplan

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

## **PART B - YOUR REPRESENTATION**

Please use a separate form Part B for each representation, and supply together with Part A so we know
who has made the comment. Please also read the Guidance Note that accompanies this form before you
complete it.

| 3. To which                    | part of the Local Pla                           | an does this repre                              | sentation relate?  |                                       |
|--------------------------------|---|---|--|---------------------------------------|
| Policy<br>LPAOL<br>SITE<br>IHS | Paragraph/<br>diagram<br>table                  | Policies<br>Map                                 | Sustainability Appraisal/ Strategic Environmental Assessment   | Habitats<br>Regulations<br>Assessment |
|                                | ments (please name<br>and relevant part/section | on)   |  |                                       |
|                                | onsider the St Helen<br>ad the Guidance note    |   | Plan 2020-2035 is:<br>f Legal Compliance and the   | ne Tests of Soundness                 |
| Legally Con                    | npliant?  |   | Yes No   |                                       |
| Sound?                         |   |   | Yes 🔽 No   |                                       |
| Complies w                     | rith the Duty to Cooper                         | rate  | Yes 🗹 No   |                                       |
| Please tick                    | as appropriate                                  |   |  |                                       |
|                                | 2 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 -         |   | f the Tests of Soundness   |                                       |
| Effective?                     |   |   |  |                                       |
| Consistent                     | with National Policy?                           | Ø   |  |                                       |
| or fails to                    | comply with the du                              | ty to cooperate. <u>P</u><br>al compliance or s | cal Plan is <u>not legally co</u><br>lease be as precise as p<br>soundness of the Local l  | ossible.                              |
| one of t                       | the purposes of growing the reco                | where are<br>Greenbelt ist<br>ycling of di      | should provide station of St. He ation of St. He all the people continued there we age this. The harm to the purphable because of bus routes and other with the purphable because of st. bus routes and pround with other at pround with other st. | regeneration<br>ben land.             |

| Del<br>of                                     | iete<br>the   | this<br>Gree  | land<br>n belt   | Frem   | the                                       | b voba   | bos of  | removal  |           |
|---|---|---|--|--|---|--|---|--|-----------|
|   |   |   |  |  |   |  |   |  |           |
|   |   |   |  |  |   | I the inform   | nation, e   | vidence and support  |           |
| rmation not not not not not not not not not n | on neces<br>ormally b<br>tation at<br>s stage,<br>es he/sh<br>ur repres | sary to sup e a subseq the publicat further sub e identifies sentation is | port/justify<br>quent oppo<br>tion stage.<br>omissions<br>s for exam                             | the repres<br>rtunity to m<br>will be on<br>ination.                               | entation a<br>nake further<br>by at the u | I the informand suggerer represe   | mation, e<br>sted mod<br>ntations                           | Water to the last  | ng<br>tte |
| rmation not not not not not not not not not n | on neces ormally b tation at s stage, es he/sh ur repres oral part      | sary to sup e a subseq he publicat further sub e identifies               | port/justify<br>juent oppo<br>tion stage.<br>omissions<br>s for exam<br>s seeking a<br>mination? | the repres<br>rtunity to m<br>will be on<br>ination.<br>a modifica<br>(the hearing | entation a<br>nake further<br>ly at the i | I the informand suggerer representations of the constitution of th | mation, e<br>sted mod<br>ntations<br>f the Ins<br>der it ne | vidence and support<br>dification, as there<br>based on the origina<br>pector, based on ma | ng<br>tte |

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.

# RO1372



# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

(For official use only)

Please also read the Representation Form Guidance Note that is available with this form, or online at: www.sthelens.gov.uk/localplan

Please ensure the form is returned to us by no later than 5pm on Wednesday 13th March 2019. Any comments received after this deadline cannot be accepted.

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

## PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

| Your Details    (we will correspond via your agent)  | 2. Your Agent's Details (if applicable)  |
|--|--|
| Title: MRS.  | Title:   |
| First Name: GLENNIS  | First name:  |
| Last Name: PARKINSON   | Last Name:   |
| Organisation/company:  | Organisation/company:  |
| Address: 37 SPRINGFIELD PARK   | Address:   |
| ST- MEDIENS MERSKY STDE  |  |
| Postcode: WAII OXP   | Postcode:  |
| Tel No:  | Tel No:_/  |
| Mobile No  | Mobile No:   |
| Email:   | Email:   |
| Signature:   | Date: 5th March 9019,  |
| considered you MUST include your details above   | e accepted and that in order for your comments to be   |
| Would you like to be kept updated of future st<br>(namely submission of the Plan for examination,<br>adoption of the Plan) | ages of the St Helens Borough Local Plan 2020-2035? publication of the Inspector's recommendations and |
| Yes (via email)  | ☐ No   |
| Please note - email is the Council's preferred me we will contact you by your postal address.                              | ethod of communication. If no email address is provided,   |

### RETURN DETAILS

Please return your completed form to us by no later than 5pm on Wednesday 13th March 2019 by:

post to:

Local Plan

St. Helens Council

Town Hall Victoria Square

St Helens WA10 1HP

or by hand delivery to:

Ground Floor Reception St.Helens Town Hall

(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

### **FURTHER INFORMATION**

If you require further information please see the FAQs on our website: www.sthelens.gov.uk/localplan

If you still need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk

Telephone: 01744 676190

### **NEXT STEPS**

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

### DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website; www.sthelens.gov.uk/localplan

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

## PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

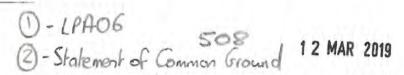
| Aby SEA table SEA SEA table SEA SEA TO SEA | 3. To w             | hich par                            | rt of the Local Pla  | an does this repre   | esentation relate?                            |                                       |
|--|---------------------|-------------------------------------|--|--|---|---------------------------------------|
| 4. Do you consider the St Helens Borough Local Plan 2020-2035 is: Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundr  Legally Compliant?   | Policy<br>LP<br>AO4 | ZEA<br>SEA                          | diagram  | Contract of the contract of th | Appraisal/<br>Strategic<br>Environmental      | Habitats<br>Regulations<br>Assessment |
| Please read the Guidance note for explanations of Legal Compliance and the Tests of Sound?  Legally Compliant?  Yes Dant Know No  Sound?  Yes No  Please tick as appropriate  5. If you consider the Local Plan is unsound, is it because it is not: Please read the Guidance note for explanations of the Tests of Soundness  Positively Prepared?  Justified?  Effective?  Consistent with National Policy?  6. Please give details of why you consider the Local Plan is not legally compliant or is unsor fails to comply with the duty to cooperate. Please be as precise as possible.  If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.  1) No exceptional circumstances, to wheast this land 2) This where of Greenbelt will cause significant form to purpose the Greenbelt as already granted planning pleanussion in the Greenbelt as already granted planning pleanussion in the Greenbelt was already granted planning pleanussion in the Greenb |                     |                                     |  | ion)   |   |                                       |
| Sound?  Complies with the Duty to Cooperate  Yes  No  Please tick as appropriate  5. If you consider the Local Plan is unsound, is it because it is not: Please read the Guidance note for explanations of the Tests of Soundness  Positively Prepared?  Justified?  Effective?  Consistent with National Policy?  6. Please give details of why you consider the Local Plan is not legally compliant or is unsor fails to comply with the duty to cooperate. Please be as precise as possible.  If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.  1) No exceptional circumstances, to whease this land 2) This reflected  3) The Council has already granted planning pleanession in the Council has already granted planning pleaness pleaness pleaness planning pleaness planning pleaness pleaness ple | 4. Do y             | ou cons                             | sider the St Helen<br>the Guidance note                      | s Borough Local<br>for explanations of   | Plan 2020-2035 is:<br>of Legal Compliance and | the Tests of Soundness                |
| Please tick as appropriate  5. If you consider the Local Plan is unsound, is it because it is not: Please read the Guidance note for explanations of the Tests of Soundness  Positively Prepared?  Justified?  Effective?  Consistent with National Policy?  6. Please give details of why you consider the Local Plan is not legally compliant or is unsor fails to comply with the duty to cooperate. Please be as precise as possible.  If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.  1) No exceptional circumstances, to whease this land 2) Mis whelse of Greenbell will cause significant harm to purpose the Greenbelt 3) The Council has already granted planning permission in the Council has already granted pla | Legall              | y Compli                            | ant?   |  | Yes Don't Know \ No                           |                                       |
| Please tick as appropriate  5. If you consider the Local Plan is unsound, is it because it is not: Please read the Guidance note for explanations of the Tests of Soundness  Positively Prepared?  Justified?  Effective?  Consistent with National Policy?  6. Please give details of why you consider the Local Plan is not legally compliant or is unsor fails to comply with the duty to cooperate. Please be as precise as possible.  If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.  1) No exceptional circumstances, to whease this land 2) This whale of Greenbell will cause significant harm to purpose the Greenbelt  3) The Council has already granted planning pleanussion in the Counci |                     |                                     |  |  | Yes No  |                                       |
| 5. If you consider the Local Plan is unsound, is it because it is not:  Please read the Guidance note for explanations of the Tests of Soundness  Positively Prepared?  Justified?  Effective?  Consistent with National Policy?  6. Please give details of why you consider the Local Plan is not legally compliant or is unsor fails to comply with the duty to cooperate. Please be as precise as possible.  If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.  1) No exceptional circumstances, to wheat his land  2) This where of Greenbell will cause significant have to purpose the Greenbell will cause significant have to purpose the Greenbell of Site 2ED Florida Farm North — 2 massive in   | Comp                | lies with                           | the Duty to Coope  | rate   | Yes No  |                                       |
| 5. If you consider the Local Plan is unsound, is it because it is not: Please read the Guidance note for explanations of the Tests of Soundness  Positively Prepared?  Justified?  Effective?  Consistent with National Policy?  6. Please give details of why you consider the Local Plan is not legally compliant or is unsor fails to comply with the duty to cooperate. Please be as precise as possible.  If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.  1) No exceptional circumstances, to wheat this land  2) This where of Greenbell will cause significant have to purpose the Greenbell will cause significant have to purpose the Greenbell of Site 2ED Florida Farm North — 2 massive in the Council has already granted planning permission in the Council has alread | Please              | tick as a                           | appropriate  |  |   |                                       |
| or fails to comply with the duty to cooperate. Please be as precise as possible.  If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.  i) No exceptional circumstances, to whease this land  2) This whole of Greenbell will cause significant have to purpose the Greenbelt  3) The Council has already granted planning permission in the Council has already granted planning permiss | Effect              | ive?                                | n National Policy?   | Q<br>Q   |   |                                       |
| 2) This netbase of Greenbell will cause significant round post.  The Greenbelt  3) The Council has already granted planning permission in the Council has a permission of the Council has a perm | or f                | ails to co<br>ou wish to<br>this bo | omply with the du<br>to support the leg<br>x to set out your | uty to cooperate.<br>gal compliance or<br>comments.  | Please be as precise as soundness of the Loca | possible.                             |
| in respect of site 2RA - Florida Farm North - 2 massive in   | 2)1                 | VIS MA                              | base of live   | enbell will c  | ause significan                               |                                       |
| A) Kigh volumes of predicted traffic, on country lares, will add to already over capacity on the highways in the vicinity.  5) Not justified the council should be put to strick proof of the for this type of development here and on this scale - Plenty of emproverbousces already on Maydock Industrial Estate.  b) Brownfield & development sites should be used first please continue on a separate spee   | Al M                | 1am Vo                              | itumies of pred  | acrea mygarc,  | on comorny                                    |                                       |

|   | Delete  | His land<br>Greenhelt   | ofrem.   | the  | proposed  | renoval  | from  | the            |
|---|---|---|--|--|---|--|---|----------------|
|   |   |   |  |  | Ple   | ase continue on a  | separate sheel  | t if necess    |
| rmati<br>not n  | ion necessar<br>normally be a   | presentation should<br>y to support/justify the<br>subsequent opporto<br>publication stage.   | he represer  | ntation  | and suggest   | ed modification  | n, as there   | 9              |
| rmati<br>not n<br>reser<br>er thi<br>issu                   | ion necessar<br>normally be a<br>ntation at the<br>is stage, furt<br>ues he/she io<br>our represent                   | y to support/justify the<br>subsequent opport   | he represer<br>tunity to mai<br>vill be only<br>nation.<br>modification                | ntation ike furt at the on; do                     | and suggest<br>ther represent<br>request of the<br>you conside  | ed modification ations based he Inspector,                             | on, as there<br>on the orig<br>based on                     | inal<br>matter |
| rmati<br>not n<br>reser<br>er thi<br>issu<br>If yo<br>the c | ion necessary normally be a ntation at the is stage, furt ues he/she ic our represent oral part of t                  | y to support/justify the subsequent opporting the publication stage.  The submissions was dentifies for examination is seeking a  | he represer<br>tunity to mai<br>vill be only<br>nation.<br>modification<br>the hearing | ntation ike furt at the on; do                     | and suggest<br>ther represent<br>request of the<br>you consider<br>tublic)                                | ed modification ations based he Inspector,                             | on, as there<br>on the orig<br>based on<br>y to partic      | inal<br>matter |
| rmatinot not not not not not not not not not                | ion necessar<br>normally be a<br>ntation at the<br>is stage, furt<br>ues he/she io<br>our represent<br>oral part of t | y to support/justify the subsequent opport publication stage.  The submissions was dentifies for examination? (the examination? (the examination) which is seeking a submission of the examination. | he represer<br>tunity to mai<br>vill be only<br>nation.<br>modification<br>the hearing | ntation<br>ike furt<br>at the<br>on; do<br>gs in p | and suggest<br>ther represent<br>request of the<br>you consider<br>bublic)  Yes, I wish to<br>examination | ed modification ations based he Inspector, r it necessar participate a | on, as there on the orig  based on  y to partic  t the oral | inal<br>matte  |

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.





Ref: LPSD

## St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

(For official use only)

Please also read the Representation Form Guidance Note that is available with this form, or online at: www.sthelens.gov.uk/localplan

Please ensure the form is returned to us by no later than 5pm on Wednesday 13th March 2019. Any comments received after this deadline cannot be accepted.

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

### PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

| Your Details    (we will correspond via your agent)  | 2. Your Agent's Details (if applicable)  |
|--|--|
| Title: MRS   | Title:   |
| First Name: GLEWALS  | First name:  |
| Last Name: PARKINSON   | Last Name:   |
| Organisation/company:  | Organisation/company:  |
| Address: 37 SPRINGFIED PARK  | Address:   |
| STHILLENS  | Postcode:  |
|  | Tel No:  |
|  | Mobile No:   |
|  | Email:   |
| Signature:   | Date: 10/3/19  |
| Please be aware that anonymous forms cannot be considered you MUST include your details above. | accepted and that in order for your comments to be   |
| Vould you like to be kept updated of future sta  | ges of the St Helens Borough Local Plan 2020-2035? ublication of the Inspector's recommendations and |
| Yes ( <del>via email)</del> postal address please  | □ No   |
|  | hod of communication. If no email address is provided,   |

#### **RETURN DETAILS**

Please return your completed form to us by no later than 5pm on Wednesday 13th March 2019 by:

post to:

Local Plan St.Helens Council Town Hall Victoria Square St Helens WA10 1HP

or by hand delivery to:

Ground Floor Reception St. Helens Town Hall (open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

#### **FURTHER INFORMATION**

If you require further information please see the FAQs on our website: www.sthelens.gov.uk/localplan

If you still need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk

Telephone: 01744 676190

### **NEXT STEPS**

The Council intends to submit the St. Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

### **DATA PROTECTION**

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: www.sthelens.gov.uk/localplan

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

### PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

| LPA SITE<br>06 ZES   | table   | Policies<br>Map  | Sustainability Appraisal/ Strategic Environmental Assessment  | Habitats<br>Regulations<br>Assessment   |
|--|---|--|---|---|
|  | ents (please name<br>d relevant part/sect   | ion)   |   |   |
| 4. Do you con<br>Please read   | sider the St Helen<br>the Guidance note   | s Borough Local F  | Plan 2020-2035 is:<br>Legal Compliance and th   | ne Tests of Soundness   |
| Legally Comp   | liant?  |  | Yes Tho   |   |
| Sound?   |   |  | Yes No  |   |
| Complies with  | the Duty to Coope   | rate \( \square\)  | Yes No  |   |
| Please tick as   | appropriate   |  |   |   |
| Effective?<br>Consistent with  | h National Policy?  | E E  | 5   | . ×   |
|  |   | Andrew Commence of the Commenc |   |   |
| or fails to co If you wish to use this box Not justifie for this to As his so the lifespar remain in   | to support the leg<br>x to set out your of  The Gund  pe of develop  e is allocate  the Greenbert   | al compliance or somments.  The NID Be merel, in this d as Bajegna pe of warehow the send of the land  | ease be as precise as poor oundness of the Local Propositions and on the saled until after se development, the Local Plan | Plan, please also  of of the need -  his scale,  2035 and given  he site should  of need can  Period.                             |
| or fails to co If you wish to use this book Not justified for this to As his so the lifespar remain in be re-evo One of the by encourse Using Grei | omply with the du to support the leg x to set out your of  The Gund  pe of develop  e is allocate  the Greenbert  clusted out  puoposes of  gend the rece  enbett facts t | ty to cooperate. Please as compliance or somments.  Should be merely in this of as Eaglegna ple of wavehouse the Greanbert cycling of discourage   | ease be as precise as poor oundness of the Local P  | plan, please also  of of the need  his scale,  2035 and given the site stronted of need can period.  urban regenerat  urban land. |

# · Continuation sheet - Glennis Parkinson Policy LPA. 06 Site 2ES

- The Councit has already granted planning permission in the Greenbelt in respect of lete 2EA Thorida Farm North a massive development of 2 gigantic wavehomes, which are less than two nicles from this site and has received applications for similar developments at SEA, land to the west of Hoeyelook Lane and SEA, Parkside west. Newton-le-Willows. Why should this area be the wavehouse Capital of Str Helens?
- 5) High volumes of predicted troffic will add to the dready over capacity on Junetion 23 of the Mb.
- 6) There is no statemed of common ground with neighbourn authorities [3]

| De                  | lete      | Hys                        | land  | from                               | the                             | proposed        | remeval       | from          | the       | Greenbett             |
|---------------------|-----------|----------------------------|---|------------------------------------|---------------------------------|-----------------|---------------|---------------|-----------|-----------------------|
|                     |           |                            |   |                                    |                                 |                 | PI            | ease continue | on a sepa | arate sheet if necess |
| this<br>ssue<br>you | stages he | at the<br>je, fur<br>she i | publica<br>ther sub<br>dentifie<br>station is | tion stag<br>omission<br>s for exa | e.<br>ns will<br>imina<br>g a m | tion.           | e request of  | the Inspe     | ctor, ba  | sed on matter         |
|                     | No,       | l do n                     |   | o particip                         |                                 |                 | Yes, I wish t |               | ate at th | ne oral               |
|                     |           |                            | articipa                                      | te at the                          | oral                            | part of the exa | amination, pl | ease outli    | ne why    | you consider          |

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.

1 - CPAOS 523 2 - Statement of Common Ground

1 2 MAR 2019



## St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

(For official use only)

Please also read the Representation Form Guidance Note that is available with this form, or online at:

www.sthelens.gov.uk/localplan Please ensure the form is returned to us by no later than 5pm on Wednesday 13th March 2019. Any comments received after this deadline cannot be accepted.

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

### PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

| Your Details    (we will correspond via your agent)  | 2. Your Agent's Details (if applicable)   |
|--|---|
|  | Title:  |
| First Name: GLENNIS  Last Name: PARKINSON  Organisation/company:                               | Last Name:Organisation/company:   |
| Address: 37 SARINGFIELD PARK   | Address:  |
| O- HD ENS  |   |
| Postcode: NAII OXP   | Postcode: Tel No: Mobile No: Email:   |
| Signature:   | Date: 5/3/19  |
| considered you MUST include your details above.  | accepted and that in order for your comments to be                              |
| (namely submission of the Plan for examination, po<br>adoption of the Plan)                    | ublication of the Inspector's recommendations and                               |
| Yes (via email)  | □ No  |
| Please note - email is the Council's preferred met we will contact you by your postal address. | hod of communication. If no email address is provided se postal address please. |

### RETURN DETAILS

Please return your completed form to us by no later than 5pm on Wednesday 13th March 2019 by:

post to:

Local Plan St.Helens Council Town Hall Victoria Square St Helens WA10 1HP

or by hand delivery to:

Ground Floor Reception St. Helens Town Hall

(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

### **FURTHER INFORMATION**

If you require further information please see the FAQs on our website: www.sthelens.gov.uk/localplan

If you still need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk

Telephone: 01744 676190

### **NEXT STEPS**

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

### **DATA PROTECTION**

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: www.sthelens.gov.uk/localplan

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

### PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

| 3. To w  | hich par                         | t of the Local F                          | lan does this rep                               | presentation relate?   |                     |   |
|--|----------------------------------|---|---|--|---------------------|---|
| Policy<br>LPA<br>-05   | SITE 244                         | Paragraph/<br>diagram<br>table            | Policies<br>Map                                 | Sustainabil<br>Appraisal/<br>Strategic<br>Environme<br>Assessmer | ntal                | Habitats<br>Regulations<br>Assessment   |
|  |                                  | ts (please name<br>relevant part/sec      |   |  |                     |   |
| <b>4. Do y</b><br>Plea   | ou cons                          | ider the St Hele<br>he Guidance no        | ns Borough Loc<br>te for explanations           | al Plan 2020-2035 is<br>of Legal Complian                        | s:<br>ce and the To | ests of Soundness   |
| Legally  | / Complia                        | ant?                                      | - Don't Know [                                  | Yes  | ] No                |   |
| Sound  | ?                                |   |   | ☐ Yes  | No                  |   |
| Compl  | ies with t                       | he Duty to Coop                           | erate [   | Yes  | J-No                |   |
| Please   | tick as a                        | ppropriate                                |   |  | ment .              |   |
| 5. If yo   | se read t                        | <b>ler the Local Pl</b><br>he Guidance no | an is <u>unsound,</u> is<br>te for explanations | s it because it is no<br>s of the Tests of Sou                   | t:<br>ndness        |   |
| Positiv  | ely Prepa                        | red?                                      |   | 1  |                     |   |
| Justifie   | ed?                              |   | [   | 3  |                     |   |
| Effecti  | ve?                              |   | [   | Y .  |                     |   |
| Consis   | stent with                       | National Policy?                          |   | y .  |                     |   |
| Effection Consistence of Consistence | ve?<br>stent with<br>use give of | details of why y                          | ou consider the                                 | Local Plan is <u>not le</u>                                      | ise as poss         | ible.   |
|  |                                  | support the le<br>to set out your         |   | or soundness of the  | e Local Plan        | i, piease aiso  |
| 19   | n St.                            | Helens, The                               | population -Helens is a                         | of Stillehen b<br>omnavatively el                                | ood been            | esp of Greenbell m decline Since in low demand in urban t and urban problems— esity: It is a is a step in |

- 4) Housing in the area Isn't sustainable because of the lack of school places, medical centres, bus and train services and other services. The use of cars is being encouraged because of the lack of facilities.
- Read to this site just writ safe and would cause major problems. Another junction out birerpool Road and Vicarage Road would totally overburden the roads nearby. The infrastructure just whit there to cope with so made many added vehicles.
  - b) There are existing flooding problems on Meis site. During wet weather large ponds appear. Remedies to prevent this would place even greater problems for the Clipsley Book.
  - 7) The Council's own register stons there is enough biometical land in St-Helens for 5,818 houses. Use Brownfield and develot land before Greenbelt is released.
  - 8) The reasons for release of Greenbelf is not justified and St Helens Conneil should prove how the population will increase.
  - anthorities.
  - ro). As proved recently with marries about imported produce, BREXIT) we need all the Greenbelt so we can grow our own crops. Once Greenbelt is gone this would be impossible.

11) Because Haydock High School is a poor performing school money residents send their diddren to schools in the neighbourned Boreigh of Wigan. This also applies to the Catholic School Secondary) []

12) Use of Greenbelt for development should not be used as a [12] Use of Greenbelt for development should not be used as a [13] Use of Greenbelt for development should not be used as a [14] Use of Greenbelt for development should not be used as a [15] Use of Greenbelt for development should not be used as a [16] Use of Greenbelt for development should not be used as a [18] Use of Greenbelt for development should not be used as a [18] Use of Greenbelt for development should not be used as a [18] Use of Greenbelt for development should not be used as a [18] Use of Greenbelt for development should not be used as a [18] Use of Greenbelt for development should not be used as [18] Use of Greenbelt for d

|  | Delete  | Kris  | land   | from  | He  | proposed  | removal  |
|--|---|---|--|---|---|---|--|
|  | from  | the   | Green  | rbelt.  |   | proposed  |  |
|  |   |   |  |   |   | Please contin   | ue on a separate sheet if nece   |
| mation   | necessary to  | support   | justify the  | representa  | ation and   | suggested modi  | idence and supporting<br>ification, as there   |
| mation<br>not nor<br>esenta<br>r this s<br>issues                        | necessary to<br>mally be a su<br>ion at the pul<br>stage, furthe<br>he/she iden | support<br>bsequent<br>blication s<br>r submis<br>ntifies for       | /justify the<br>t opportur<br>stage.<br>sions will<br>examina          | representa<br>nity to make<br>I be only at<br>tion. | ation and<br>further ro   | suggested modi<br>epresentations b<br>uest of the Insp                    |  |
| mation<br>not nor<br>esenta<br>er this s<br>issues<br>If your<br>the ora | necessary to<br>mally be a su<br>ion at the pul<br>stage, furthe<br>he/she iden | support bsequent blication: r submis rtifies for ion is see examina | /justify the topporture stage. sions will examina exing a mation? (the | representa<br>nity to make<br>I be only at<br>tion. | t the requirements of the | suggested modi<br>epresentations b<br>uest of the Insp<br>consider it nec | ification, as there ased on the original ector, based on matteressary to participate |

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

### **Representor Details**

| Web Reference Number | WF0310                |
|----------------------|-----------------------|
| Type of Submission   | Web submission        |
| Full Name            | Mrs Glennis Parkinson |
| Organisation         |                       |
| Address              | 37 Springfield Park   |
|                      | Haydock               |
|                      | St.Helens             |
|                      | Merseyside WA11 0XP   |
| Agent Details        |                       |

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

### 3. To which part of the Local Plan does this representation relate?

| Policy                               | LPA 06 Site 2HS |
|--------------------------------------|-----------------|
| Paragraph / diagram / table          |                 |
| Policies Map                         |                 |
| Sustainability Appraisal / Strategic |                 |
| Environmental Assessment             |                 |
| Habitats Regulation Assessment       |                 |
| Other documents                      |                 |

#### 4. Do you consider the St Helens Borough Local Plan 2020-2035:

| Is legally compliant?                | No |
|--------------------------------------|----|
| Is sound?                            | No |
| Complies with the duty to cooperate? | No |

#### 5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

### 6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

I do not understand why this site is being safeguarded.

It is a sustainable site for development

It has the benefit of - perfect transport links of regular bus and train services etc

School places and medical services widely available

No flooding problems

Park side development would give job opportunities to new residents

Newly refurbished leisure facilities nearby.

Newly refurbished Newton Railway Station within 1 mile providing the city centres on a regular basis.

Daytime/evening economy of the Newton le Willows High Street

The market town of Earlestown nearby

### 7. Please set out modification(s) you consider are necessary

This site should be allocated for immediate delivery. Many people want to live in this area.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

| Response Date | 3/7/2019 3:30:31 PM |
|---------------|---------------------|

### RO1373

| A 900 m  |
|--|
| An ale   |
| The state of the s |
| C.T.   |
| St.Helens  |
| Council  |

334 (1-LPAOS Q-Statement of Common Ground 3-LPAOS Q-Statement of Common Ground St Helens Borough Local Plan 2020-2035 (Submission Draft)

Ref: LPSD

Representation (i.e. Comment) Form

(For official use only)

Please also read the Representation Form Guidance Note that is available with this form, or online at <a href="https://www.sthelens.gov.uk/localplan">www.sthelens.gov.uk/localplan</a>.

Please ensure the form is returned to us by no later than <u>5pm on Wednesday 13th March</u> <u>2019</u>. Any comments received after this deadline <u>cannot</u> be accepted.

This form has two parts:

Part A - Personal Details

Part B - Your Representation(s).

### PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

| 1. Your Details  | Your Agent's Details (if applicable) (we will correspond via your agent) |  |  |
|--|--|--|--|
| Title:   | Title:   |  |  |
| First Name: DENNIS PARTIES   | First name:  |  |  |
| Last Name: PARKINSON   | Last Name:   |  |  |
| Organisation/company:  | Organisation/company:  |  |  |
| Address: 436 GARSWOOD ROAD<br>NORTH AS 470N<br>NEAR WIGAN<br>Postcode: WN4 OXJ | Address:   |  |  |
|  | Tel No:<br>Mobile No:  |  |  |
|  |  |  |  |
|  | Email:   |  |  |

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you MUST include your details above.

| Would you like to be kept updated of future Plan 2020-2035? (namely submission of the Inspector's recommendations and adoption of the Inspector's recommendations. | Plan for examination, publication of the |
|--|--|
| Yes 🔼 (Via Email)  | No 🗌                                     |

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

### **RETURN DETAILS**

Please return your completed form to us by no later than 5pm on Wednesday 13th March 2019 by:

post to:

Local Plan

St. Helens Council

Town Hall Victoria Square St. Helens Merseyside WA10 1HP

or by hand delivery to:

Ground Floor Reception, St. Helens Town Hall (open Monday-

Friday 8:30am - 5:15pm)

or by e-mail to:

planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

### **FURTHER INFORMATION**

If you require further information please see the FAQs on our website at www.sthelens.gov.uk/localplan. If you still need assistance, you can contact us via:

Email:

planningpolicy@sthelens.gov.uk

Telephone:

01744 676190

#### **NEXT STEPS**

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

### **DATA PROTECTION**

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website at <a href="https://www.sthelens.gov.uk/localplan">www.sthelens.gov.uk/localplan</a>.

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete <u>PART B</u> of this form, setting out your representation/comment.

# Please use a separate copy of Part B for each separate comment/representation.

### PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

| Policy Paragraph / diagram / table   | Policies<br>Map                           | HA                   | Sustainability Appraisal/ Strategic Environmental Assessment | Habitats<br>Regulation<br>Assessment |
|--|---|----------------------|--|--------------------------------------|
| Other documents (please name document and relevant part/section)                               |   |                      |  |                                      |
| 4. Do you consider the St Helen:<br>Please read the Guidance note for                          |   |                      |  | Tests of Soundness                   |
| Legally Compliant?   | Yes 🔼                                     |                      | No C   |                                      |
| Sound?   | Yes 🗆                                     |                      | No K   |                                      |
| Complies with the Duty to Cooperate  | Yes 🗆                                     |                      | No 🗷   |                                      |
|  |   |                      |  |                                      |
| Please tick as appropriate   |   |                      |  |                                      |
| 5. If you consider the Local Plan Please read the Guidance note for                            | is <u>unsound,</u> is<br>explanations of  | s it bed<br>f the Te | cause it is not:   | , l                                  |
| 5. If you consider the Local Plan<br>Please read the Guidance note for<br>Positively Prepared? | is <u>unsound,</u> is<br>explanations of  | s it bed<br>f the Te | cause it is not:   |                                      |
| 5. If you consider the Local Plan<br>Please read the Guidance note for<br>Positively Prepared? | is <u>unsound</u> , is<br>explanations of | s it bed<br>f the Te | cause it is not:<br>ests of Soundness                        |                                      |
| 5. If you consider the Local Plan Please read the Guidance note for                            | explanations of                           | s it bed<br>f the To | cause it is not:<br>ests of Soundness                        |                                      |

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

Not justified-the council should be put to strict proof of it's population estimates, as the population of St Helens has declined since 1981. Where are all the extra people coming from? One of the purposes of the Green Belt is to assist in urban regeneration by encouraging the recycling of of derelict and other land. Using Green Belt does not do this. Release of Green Belt will cause significant harm to the purposes of the Green Belt. Houses in this area is not sustainable due to the lack of school places, there will need to be a school built on the new estate as the school run on the estate is very chaotic, with cars parked around the school

causing an obstruction to all road users, this is due to local people living on the estate taking their children to school. Doctor's surgeries, bus routes, parking at the train station is limited and people from the estate, who use the train are parking in Strange Road, School Lane, Station Road and Victoria Road, leaving their cars all day while they use the train. This causes obstruction for buses and other traffic. The use of cars is being encouraged due to lack of facilities. The access to the site on either Billinge Road/Garswood Road is not adequate due to narrow road and lack of pavements. Also the amount of traffic already using these roads is increasing. There are a lot of walkers and it is getting really bad crossing these roads due to the increased amount of traffic. . Any necessary highways work must be funded by the developer\_ and not the council tax payer. There is no statement of common ground. Growing up I remember the coal pits, there were four pits. One on the land off Billinge Road, from Simms Lane up to Billinge, one on Arch Lane, two on Garswood Road/Winstanley Road and an open cast on Garswood Road/Winstanley Road. There are mine shafts under all the fields and under 1HA. This will need to be factored into the cost of building the estate. N.B. The number of children with asthma is increasing due to pollution and Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plar legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Due to pollution and extra traffic coming from the new development would it not be better to spread the houses creating villages instead of estates, there is plenty of land? Also, there is two plots of land in Billinge Road where houses have been pulled down. There is also two on Leyland Green Road. Look for other plots as we need the Green Belt for farming. There is a wide road from Billinge to the East Lancs at Carr Mill, Birchley Road/Carr Mill Road. In addition, there is a railway station in Orrell with a bus service from St Helens to Wigan through Orrell every fifteen minutes. Would it help if you use incentives for builders to use brown land, eg free planning permission?

Please continue on a separate sheet if necessary

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

|   | September 1995 and the |  |
|---|--|--|
| × | No, I do not wish to participate at the oral examination   | Yes, I wish to participate at the oral examination |

|  | .45 |  |
|--|-----|--|
|  |     |  |

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

# Please use a separate copy of Part B for each separate comment/representation.

### PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

| Policy Paragram / diagram / table                           |                            | olicies<br>lap | 1 HS   | Sustainability Appraisal/ Strategic Environmental Assessment | Habitats<br>Regulation<br>Assessment                              |  |
|---|----------------------------|----------------|--------|--|---|--|
| Other documents (please document and relevant part/section) | name                       |                |        |  |   |  |
| 4. Do you consider the S<br>Please read the Guidance        | ote for expla              | nations (      |        | Compliance and ti  |   |  |
| Legally Compliant?  | Yes                        |                |        | No   |   |  |
| Sound?  | Yes                        |                |        |  | No E  |  |
| Complies with the Duty to Y Cooperate                       |                            | /es □          |        | No   | No 🛭  |  |
| 5. If you consider the Loc<br>Please read the Guidance      |                            |                |        |  |   |  |
| Positively Prepared?  |                            |                |        |  |   |  |
| Justified?<br>Effective?                                    | N N                        |                | -      |  |   |  |
| Consistent with National                                    | Policy?                    |                |        |  |   |  |
| or fails to comply with the                                 | duty to coo<br>legal compl | perate.        | Please | be as precise as   | y compliant or is unsound<br>possible. Plan, please also use this |  |

One of the purposes of the Green Belt is to assist in urban regeneration by encouraging the recycling of of derelict and other land. Using Green Belt does not do this. Release of Green Belt

will cause significant harm to the purposes of the Green Belt. Houses in this area is not sustainable due to the lack of school places, there will need to be a school built on the new estate as the school run on the estate is very chaotic, with cars parked around the school—

causing an obstruction to all road users, this is due to local people living on the estate taking their children to school. Doctor's surgeries, bus routes, parking at the train station is limited and people from the estate, who use the train are parking in Strange Road, School Lane, Station Road and Victoria Road, leaving their cars all day while they use the train. This causes obstruction for buses and other traffic. The use of cars is being encouraged due to lack of facilities. The access to the site on either Billinge Road/Leyland Green Road is not adequate due to narrow road and lack of pavements. Also the amount of traffic already using these roads is increasing. There are a lot of walkers and it is getting really bad crossing these roads due to the increased amount of traffic. Any necessary highways work must be funded by the developer and not the council tax payer. There is no statement of common ground. Have lived in Garswood/Simms Lane End for seventy years. Growing up I remember the coal pits, there were four pits. One on the land off Billinge Road, from Simms Lane up to Billinge, one on Arch Lane, two on Garswood Road/Winstanley Road and an open cast on Garswood Road/Winstanley Road. This will need to be factored in to the cost of building the estate.

N.B. The number of children with asthma is increasing due to pollution and

Please continue on a separate sheet if necessary

3

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Due to pollution and extra traffic coming from the new development would it not be better to spread the houses creating villages instead of estates, there is plenty of land? Also, there is two plots of land in Billinge Road where houses have been pulled down. There is also two on Leyland Green Road. Look for other plots as we need the Green Belt for farming. There is a wide road from Billinge to the East Lancs at Carr Mill, Birchley Road/Carr Mill Road. In addition, there is a railway station in Orrell with a bus service from St Helens to Wigan through Orrell every fifteen minutes. Would it help if you use incentives for builders to use brown land, eg free planning permission?

### RO1374

Meadowcroft Houghtons Lane Eccleston, St. Helens. WA10 5LD

Local Plan St. Helens Council Town Hall Victoria Square St. Helens WA10 1HP

(162)

0 1 MAR 2019

Dear Sir,

ST. HELENS BOROUGH LOCAL PLAN; SUBMISSION DRAFT
TOWN AND COUNTRY PLANNING (LOCAL PLANNING) (ENGLAND) REG. 2012

I am writing with regard to the reclassification of land now known as 8HS in the Local Plan (2020-2035).

Why has this land not been taken out of the Local Plan and given back to Green Belt status completely? There are Brownfield sites that are already available (with clean up needed) and who knows how many more sites may come available between now and 2035.

The agricultural land in our area is Grade 1 and 2 (the best in Europe). We may need this land to sustain our own needs re food production in the future. Once the Green Belt protection has gone, we can't get it back.

Yours faithfully

Mrs. K. Parkinson

27 2 2019

## RO1375

**Representor Details** 

| Web Reference Number | WF0122  |  |
|----------------------|---|--|
| Type of Submission   | Web submission  |  |
| Full Name            | Mr Paul Parkinson                                     |  |
| Organisation         |   |  |
| Address              | 37 Springfield Park<br>Haydock<br>Lancashire WA11 0XP |  |
| Agent Details        |   |  |

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

| Policy                               | LPAO Site 4EA  |
|--------------------------------------|----------------|
| Paragraph / diagram / table          | EI AO SILE TEA |
| Policies Map                         |                |
| Sustainability Appraisal / Strategic |                |
| Environmental Assessment             |                |
| Habitats Regulation Assessment       |                |
| Other documents                      |                |

4. Do you consider the St Helens Borough Local Plan 2020-2035:

| Is legally compliant?                | No |  |
|--------------------------------------|----|--|
| Is sound?                            | No |  |
| Complies with the duty to cooperate? | No |  |

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

The Local Plan isn't Legally Compliant in that although my rear fence is the boundary of Parcel LPA05 – 2HA (Land at Florida Farm South) I haven't received a letter from the Council informing me that I live within 200 metres of land that it is proposing to remove from the Greenbelt. I understand that it has recently come to light that there are recently come to light that the context of the light that the context of the context of the light that the light

I understand that it has recently come to light that there appear to be many residents of Bold and Clock Face who also haven't received notification of the proposals. One can only speculate as to how many residents throughout the Borough haven't been advised of the proposals affecting them. The Council has today, 12 March 2019, announced that it has extended the consultation period for the residents of Bold and Clock Face for a further eight weeks because of the problem outlined in the above paragraph. Can the Council now be satisfied that all persons throughout the Borough who live within 200 metres of the boundary of a site which is affected by the proposals have been written to. If they aren't satisfied then they should abort the process and re-commence the consultation after making sure that all appropriate properties have received the same correspondence.

This comment is in respect of LPAO4 Site 4EA, land south of Penny Lane. On page 221 of the Local Plan there is a Plan showing the location of the site and underneath there are the requirements of

O COS

the Council. One of these is that the design and layout of the development must integrate well with that of the surrounding area.

The site is immediately adjacent to the 4 star Haydock Mercure Hotel, a Georgian style building opened in 1992 or thereabouts. To add a warehouse to the adjacent site will detract from the setting of this hotel, a setting that has already been compromised by the Council having granted planning permission for a plant hire company to the rear and side of the hotel.

That plant hire company has been permitted to cut down the trees and bushes that screened it from the A580, a prominent Gateway Corridor, according to the Council's proposal in Policy LPD06, at page 153 of the Local Plan. At night the site is floodlit and all that can be seen from the A580 Prominent Gateway Corridor is the large plant which is for hire.

The land at the rear of the Mercure Hotel is known as Empress Park and the advertising brochure for the development features an office building with a round glass tower fronting the A580. The reality is far from the idyll advertised by the brochure.

The Council appears to be obsessed with putting all its employment eggs in the basket of warehousing and a further warehouse on this site cannot be justified.

For these reasons I believe that the Local Plan isn't Legally Compliant or Sound. It isn't positively prepared because it can't justify the need for this type of development and it isn't effective because of the location adjacent to the 4 star hotel.

- 7. Please set out modification(s) you consider are necessary

  This site should be removed from the list of sites to be deleted from the Greenbelt
- 8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

| Response Date | 3/12/2019 10:23:49 PM |
|---------------|-----------------------|

# ()-LPAO6 (2)-GEN (3)-Statement of Common Ground

Representor Details

| WF0168  |
|---|
| Web submission  |
| Mr Paul Parkinson                                     |
|   |
| 37 Springfield Park<br>Haydock<br>Lancashire WA11 OXP |
|   |
|   |

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

| Policy   | LPA06 - 1HS |
|--|-------------|
| Paragraph / diagram / table                                      |             |
| Policies Map   |             |
| Sustainability Appraisal / Strategic<br>Environmental Assessment |             |
| Habitats Regulation Assessment                                   |             |
| Other documents  |             |

4. Do you consider the St Helens Borough Local Plan 2020-2035:

| Is legally compliant?                | No |
|--------------------------------------|----|
| Is sound?                            | No |
| Complies with the duty to cooperate? | No |

### 5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

The Local Plan isn't Legally Compliant in that although my rear fence is the boundary of Parcel LPA05—2HA (Land at Florida Farm South) I haven't received a letter or email from the Council informing me that I live within 200 metres of land that it is proposing to remove from the Greenbelt. I understand that it has recently come to light that there appear to be many residents of Bold and Clock Face who also haven't received notification of the proposals. One can only speculate as to how many residents throughout the Borough haven't been advised of the proposals affecting them.—The Council is quoting figures for its projected population that appear to be wildly over optimistic. —The population of St Helens has been in decline since the 1970's so the Council should be put to strict proof of its population estimates. All the surrounding Local Authorities ie Wigan, Warrington, Halton, Knowsley and West Lancashire are all forecasting similar increases in population without giving any indication of where the extra residents are coming from.

One of the purposes of the Greenbelt is to assist in urban regeneration by encouraging the recycling of derelict and other urban land. Using Greenbelt fails to encourage this.

The release of Greenbelt will cause significant harm to the purposes of the Greenbelt.

Housing in this area isn't sustainable because of the lack of school places, doctor's surgeries, bus routes and other services. The use of cars is being encouraged because of the lack of facilities.





| The access to the site on Billinge Road, Leyland Green Road or Garswood Road would be inadequate. |
|---|
| Any necessary highways works must be funded by the developer and not the Council Tax payers.———   |
| There is no statement of common ground with neighbouring authorities.                             |
|   |

- 7. Please set out modification(s) you consider are necessary
  Delete this land from the proposed removal from the Greenbelt
- 8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

| Response Date | 3/12/2019 7:03:24 PM |  |
|---------------|----------------------|--|
|---------------|----------------------|--|

# O-LPAOS 2-GEN 3)- Statement of Common Ground

Representor Details

| Web Reference Number | WF0169  |
|----------------------|---|
| Type of Submission   | Web submission  |
| Full Name            | Mr Paul Parkinson                                     |
| Organisation         |   |
| Address              | 37 Springfield Park<br>Haydock<br>Lancashire WA11 OXP |
| Agent Details        |   |

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

| Policy                               | LPA05 - Site 1HA |
|--------------------------------------|------------------|
| Paragraph / diagram / table          |                  |
| Policies Map                         |                  |
| Sustainability Appraisal / Strategic |                  |
| Environmental Assessment             |                  |
| Habitats Regulation Assessment       | ×                |
| Other documents                      |                  |

4. Do you consider the St Helens Borough Local Plan 2020-2035:

| Is legally compliant?                | No |
|--------------------------------------|----|
| Is sound?                            | No |
| Complies with the duty to cooperate? | No |

#### 5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

The Local Plan isn't Legally Compliant in that although my rear fence is the boundary of Parcel LPA05 – 2HA (Land at Florida Farm South) I haven't received a letter or email from the Council informing me that I live within 200 metres of land that it is proposing to remove from the Greenbelt. I understand that it has recently come to light that there appear to be many residents of Bold and Clock Face who also haven't received notification of the proposals. One can only speculate as to how many residents throughout the Borough haven't been advised of the proposals affecting them. — The Council is quoting figures for its projected population that appear to be wildly over optimistic. — The population of St Helens has been in decline since the 1970's so the Council should be put to strict proof of its population estimates. All the surrounding Local Authorities ie Wigan, Warrington, Halton, Knowsley and West Lancashire are all forecasting similar increases in population without giving any indication of where the extra residents are coming from.

One of the purposes of the Greenbelt is to assist in urban regeneration by encouraging the recycling of derelict and other urban land. Using Greenbelt fails to encourage this.

The release of Greenbelt will cause significant harm to the purposes of the Greenbelt.

Housing in this area isn't sustainable because of the lack of school places, doctor's surgeries, bus routes and other services. The use of cars is being encouraged because of the lack of facilities.

(2

The access to the site on either Billinge Road or Garswood Road would be inadequate. Any necessary highways works must be funded by the developer and not the Council Tax payers.

There is no statement of common ground with neighbouring authorities.

### 7. Please set out modification(s) you consider are necessary

That this land be deleted from proposed removal from the Greenbelt.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

| Response Date  | 3/12/2019 6:56:30 PM |  |
|--|----------------------|--|
| Land Control of the C |                      |  |

### **Representor Details**

| Web Reference Number | WF0226              |
|----------------------|---------------------|
| Type of Submission   | Web submission      |
| Full Name            | Mr Paul Parkinson   |
| Organisation         |                     |
| Address              | 37 Springfield Park |
|                      | Haydock             |
|                      | Lancashire WA11 0XP |
| Agent Details        |                     |
|                      |                     |

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

### 3. To which part of the Local Plan does this representation relate?

| Policy                               | LPA04 - Sites 2EA, 5EA and 6EA |
|--------------------------------------|--------------------------------|
| Paragraph / diagram / table          |                                |
| Policies Map                         |                                |
| Sustainability Appraisal / Strategic |                                |
| Environmental Assessment             |                                |
| Habitats Regulation Assessment       |                                |
| Other documents                      |                                |

#### 4. Do you consider the St Helens Borough Local Plan 2020-2035:

| Is legally compliant?                | No |
|--------------------------------------|----|
| Is sound?                            | No |
| Complies with the duty to cooperate? | No |

#### 5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

### 6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

The Local Plan isn't Legally Compliant in that although my rear fence is the boundary of Parcel LPA05 – 2HA (Land at Florida Farm South) I haven't received a letter from the Council informing me that I live within 200 metres of land that it is proposing to remove from the Greenbelt. I understand that it has recently come to light that there appear to be many residents of Bold and Clock Face who also haven't received notification of the proposals. One can only speculate as to how many residents throughout the Borough haven't been advised of the proposals affecting them.

Until the last two years or so St Helens had two free newspapers delivered on a regular basis. The St Helens Reporter is now available online only and the St Helens Star doesn't appear to be delivered in all areas and in large swathes of the Borough it isn't available for purchasing in the shops. It should not be the responsibility of pro Greenbelt Groups to bring the Local Plan to the attention of the public, that is what the Council should be doing to fulfil its statutory obligations.

A development in this position and on this scale isn't justified. Given the number of empty units in St Helens and in adjoining areas and the similar proposals in those areas, the Council should be put to strict proof of the need for these warehouses.

The release of Greenbelt will cause significant harm to the purposes of the Greenbelt in that it will close the Green spaces between the settlements of Haydock, Garswood and Blackbrook.

This representation is in respect of Policy LPA04 – Sites 2EA, 5EA and 6EA, all situated to the North of the A580 East Lancashire Road, Haydock and bounded by the A580, Slag Lane, Liverpool Road, Millfield Lane and Haydock Lane a total of almost 65 hectares or 160 acres of Greenbelt farmland to be covered in concrete, tar macadam and huge sheds.

In January 2017 the Council granted planning permission for warehouse development at Florida Farm North, (Site EA2) some 36.37 hectares of Greenbelt Land

One of the purposes of the Greenbelt is to assist in urban regeneration by encouraging the recycling of derelict and other urban land. Using Greenbelt fails to encourage this.

Development at this location would place even greater amounts of water into Clipsley Brook which floods at the junction of West End Road and Stanley Bank Way (A58).

The problem isn't made any easier because the Council, in respect of the Florida Farm North development, has relaxed its requirements for flood prevention from a one in 100 year storm plus 40% for climate change to one in a 100 year plus 10% for climate change, without giving any adequate reasons why. The Employment Land proposals at LPA04 Sites 5EA and 6EA will do nothing to ease the burden on the amount of water in Clipsley Brook.

Air pollution is already a major problem in St Helens with the statistics for deaths from pulmonary disease being higher than average. The recent BBC website article about polluted areas of the UK, list Merseyside and Manchester as two of the worst polluted areas. The A580 links these two areas and already carries a heavy burden of traffic.

The developers of the site 2EA at Florida Farm North stated in their planning application that the development would generate an estimated 6,700 additional vehicle movements per day through the A580/Haydock Lane junction. The additional air pollution caused by these vehicles was described as negligible in the report to the Planning Committee. There must come a time, however, when all the negligible amounts add up to substantial.

A re-aligned junction at A580/Haydock Lane in respect of the development at 2EA was constructed with money received from the Liverpool City Region rather than being provided by the developer in what is said to be a £150 million development. This is now a 4-way junction with Toucan crossing facilities meaning that traffic in the morning and evening peak periods is queuing for longer and so generating more pollutants.

The additional traffic generated by the additional warehouses at 5EA and 6EA will place further pressure on the already heavily over burdened local highways network. Highways works have recently been undertaken at the junction of the A58/Millfield Lane/Tithe Barn Road but it doesn't appear that any provision has been made for this additional traffic.

The loss of approximately 217 acres of farmland in this small area North and South of the A580 could prove to be crucial to the ability of the Country to grow its own food crops.

The Council doesn't appear to have provided a statement of common ground with neighbouring authorities.

### 7. Please set out modification(s) you consider are necessary

It is too late for Site 2EA as the Council has already granted planning permission for these monstrous warehouses in an inappropriate location.

In respect of Sites 5EA and 6EA these should be removed from the list of sites to be removed from the Greenbelt.

### 8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

Yes, I wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

I wish to address the inquiry on behalf of the residents of this locality who have had their lives devastated by the inappropriate development at Site 2EA.

| Response Date | 3/11/2019 12:22:42 PM |
|---------------|-----------------------|
|               | -,,                   |

**Representor Details** 

| Web Reference Number | WF0246  |
|----------------------|---|
| Type of Submission   | Web submission                                  |
| Full Name            | Mr Paul Parkinson                               |
| Organisation         |   |
| Address              | 37 Springfield Park Haydock Lancashire WA11 0XP |
| Agent Details        |   |

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

| Policy                               | LPA05 - 2HA |
|--------------------------------------|-------------|
| Paragraph / diagram / table          |             |
| Policies Map                         |             |
| Sustainability Appraisal / Strategic |             |
| Environmental Assessment             |             |
| Habitats Regulation Assessment       |             |
| Other documents                      |             |

4. Do you consider the St Helens Borough Local Plan 2020-2035:

| Is legally compliant?                | No |
|--------------------------------------|----|
| Is sound?                            | No |
| Complies with the duty to cooperate? | No |

#### 5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

The Local Plan isn't Legally Compliant in that although my rear fence is the boundary of Parcel LPA05 – 2HA (Land at Florida Farm South) I haven't received a letter or email from the Council informing me that I live within 200 metres of land that it is proposing to remove from the Greenbelt. I understand that it has recently come to light that there appear to be many residents of Bold and Clock Face who also haven't received notification of the proposals. One can only speculate as to how many residents throughout the Borough haven't been advised of the proposals affecting them. The Council is quoting figures for its projected population that appear to be wildly over optimistic. The population of St Helens has been in decline since the 1970's so the Council should be put to strict proof of its population estimates. All the surrounding Local Authorities ie Wigan, Warrington, Halton, Knowsley and West Lancashire are all forecasting similar increases in population without giving any indication of where the extra residents are coming from.

Cross referencing this with the Council's employment policy of seemingly putting all its eggs in the basket marked 'warehousing', such jobs with its notoriously low pay, will not attract workers to move into the Borough to purchase the new build housing.

One of the purposes of the Greenbelt is to assist in urban regeneration by encouraging the recycling of derelict and other urban land. Using Greenbelt fails to encourage this. Examples of brownfield sites that could be developed for housing and aren't put forward in the Local Plan are:

- Land off Parr Street in St Helens Town Centre, to the rear of St Helens Central Station. This site was formerly the Council owned abattoir which was demolished many years ago and has been derelict ever since. In close proximity to the station and the Town Centre this site would appear to be ripe for development and would clear up an unsightly mess.
- Land off Bellerophon Way, Haydock, to the rear of the Tesco Haydock. This land is currently being marketed as housing land but again it isn't allocated in the Local Plan.

  These are just two examples and there are many other areas of brownfield sites throughout the Borough that could be developed but the Council would appear to favour release of Greenbelt rather than insisting that developers remediate brownfield sites to clean up the many eyesore areas. The Council states that it has a 'brownfield first' policy but this seems to be mere lip service and is not put into practice or made manifestly clear from the Local Plan.

The release of Greenbelt will cause significant harm to the purposes of the Greenbelt in that is closing the Green spaces between the settlements of Haydock, Garswood and Blackbrook. This site, Florida Farm South, is some 23 hectares or approximately 57 acres. On the opposite side of the A580 East Lancashire Road the Council granted planning permission for warehouse development at Florida Farm North, some 36.37 hectares of Greenbelt Land.. Its proposals are that a further 28 hectares to the north of that site should also be allocated for warehousing, giving a total of almost 65 hectares or 160 acres to be covered in concrete, tar macadam and huge sheds.

Those sites, together with Florida Farm South will amount to approximately 217 acres of Greenbelt for development, a huge proportion of the Greenbelt in this vicinity.

Housing in this area isn't sustainable because of the lack of school places, doctor's surgeries, bus routes and other services. Building housing developments on the fringes of the Borough encourages the use of motor cars because of the lack of facilities.

The access to the site is inadequate, a left in/left out from the East Lancashire Road isn't safe because of the proximity to the newly re-configured junction of Haydock Lane and the A580 which lies to the East of the proposed junction.

This junction was constructed with money received from the Liverpool City Region rather than being provided by the developer in what is said to be a £150 million development. This is now a 4-way junction with Toucan crossing facilities meaning that traffic in the morning and evening peak periods is queuing for longer and the drivers are then moving away from the signals and rapidly accelerating. These vehicles will be confronted by vehicles leaving the proposed housing development. The proposal for a roundabout junction at Liverpool Road & Vicarage Road would put additional traffic on an already overstretched highways system. There would be problems of rat-running through the proposed development.

A development of this size at this location is likely to generate over 2000 additional vehicle movements per day. Anyone leaving the development to travel in the direction of Manchester can only do so by leaving at this junction and then accessing the A580 via the A58/A580 junction or by travelling through Haydock via the A599 and accessing the A580 via the Haydock Lane junction referred to above.

The Council has proposals to upgrade the A58/A580 junction but it isn't known whether the works have anticipated the additional traffic that will be generated by the proposal. Other than the construction of the roundabout referred to at the junction of Liverpool Road and Vicarage Road there don't appear to be any additional highways infrastructure proposals. This roundabout is merely to provide access to the development, it doesn't mitigate the problems that will be created by the development.

OL

05

Air pollution is already a major problem in St Helens with the statistics for deaths from pulmonary disease being higher than average. The recent BBC website article about polluted areas of the UK, list Merseyside and Manchester as two of the worst polluted areas. The A580 links these two areas and already carries a heavy burden of traffic. The developers of the site at Florida Farm North stated in their planning application that the development would generate an estimated 6,700 additional vehicle movements per day through the A580/Haydock Lane junction. The additional air pollution caused by these vehicles was described as 06 negligible in the report to the Planning Committee. There must come a time, however, when all the negligible amounts add up to substantial. There are existing flooding problems at this site any remedies to prevent this would place even greater amounts of water into Clipsley Brook which floods at the junction of West End Road and Stanley Bank Way (A58). The problem isn't made any easier because the Council for the Florida Farm North development has relaxed its requirements for flood prevention from a one in 100 year storm plus 40% for climate change to one in a 100 year plus 10% for climate change, without giving any adequate reasons why. The Employment Land proposals at LPA04 Sites 5EA and 6EA will do nothing to ease the burden on the amount of water in Clipsley Brook. The loss of approximately 217 acres of farmland in this small area could prove to be crucial to the ability of the Country to grow its own food crops.

### 7. Please set out modification(s) you consider are necessary

The site at LPA05 - 2HA should be deleted from the list of land to be deleted from the Greenbelt.

The Council doesn't appear to have provided a statement of common ground with neighbouring

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

Yes, I wish to participate at the oral examination

authorities.

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

I wish to speak on behalf of residents in the vicinity of this proposed development who have already had their lives blighted by the granting of planning permission for the warehouse development at Florida Farm North.

| Response Date | 3/10/2019 6:08:16 PM |
|---------------|----------------------|
|---------------|----------------------|

### RO1376



## St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

0 7 MAR 2019

(For official use only)

Please also read the Representation Form Guidance Note that is available with this form, or online at: www.sthelens.gov.uk/localplan

Please ensure the form is returned to us by no later than 5pm on Wednesday 13th March 2019. Any comments received after this deadline cannot be accepted.

This form has two parts;

1. Your Details

Part A - Personal Details

Part B - Your Representation(s)

2. Your Agent's Details (if applicable)

### PART A - YOUR DETAILS

(we will correspond via your agent)

Please note that you must complete Parts A and B of this form.

| First Name: WENDY   | First name:  |
|---|--|
| Last Name: PARR   | Last Name:   |
| Organisation/company:   | Organisation/company:  |
|   |  |
|   | Address:   |
|   |  |
|   | Postcode:  |
|   | Tel No:  |
|   | Mobile No:   |
|   | Email:   |
|   |  |
| Signature:  | Date: 6/3/19   |
| Please be aware that anonymous for considered you MUST include you                              | orms cannot be accepted and that in order for your comments to be r details above.   |
| Would you like to be kept update<br>(namely submission of the Plan for<br>adoption of the Plan) | ed of future stages of the St Helens Borough Local Plan 2020-2035? examination, publication of the Inspector's recommendations and |
| Yes (via email)   | <b>⊠</b> No  |
| Please note - email is the Council'   | s preferred method of communication. If no email address is provided address.  |

### **RETURN DETAILS**

Please return your completed form to us by no later than 5pm on Wednesday 13th March 2019 by:

post to:

Local Plan

St. Helens Council

Town Hall Victoria Square

St Helens WA10 1HP

or by hand delivery to:

Ground Floor Reception

St. Helens Town Hall

(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

### FURTHER INFORMATION

If you require further information please see the FAQs on our website: www.sthelens.gov.uk/localplan

If you still need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk

Telephone: 01744 676190

### **NEXT STEPS**

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

#### DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: www.sthelens.gov.uk/localplan

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

### PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

| 3. To w                                      | hich pa                | rt of the Loca                     | l Plan c            | loes this re            | epresent  | ation relate?   |          |                                       |      |  |
|--|------------------------|------------------------------------|---------------------|-------------------------|---|---|----------|---------------------------------------|------|--|
| Policy                                       | /                      | Paragraph/<br>diagram<br>table     | /                   | Policies<br>Map         | 1   | Sustainability Appraisal/ Strategic Environmental Assessment  | /        | Habitats<br>Regulations<br>Assessment | /    |  |
|  |                        | nts (please nai<br>relevant part/s |                     |                         |   |   |          |                                       |      |  |
| 4. Do y                                      | ou cons                | sider the St H                     | elens B<br>note for | orough Lo               | ocal Plan   | 2020-2035 is:<br>gal Compliance an                            | d the Te | ests of Soundne                       | ess  |  |
| Legally Compliant?                           |                        |                                    |                     |                         | ☐ Yes   |   |          |                                       |      |  |
| Sound  | ?                      |                                    |                     |                         | ☐ Yes ☒ No  |   |          |                                       |      |  |
| Compli                                       | ies with               | the Duty to Co                     | operate             |                         | ☐ Yes ☒ No  |   |          |                                       |      |  |
| Please                                       | tick as a              | appropriate                        |                     |                         |   |   |          |                                       |      |  |
| Pleas  | se read                | the Guidance                       | Plan is<br>note for | unsound,<br>explanation | is it bed<br>ins of the                                     | ause it is not:<br>Tests of Soundne                           | SS       |                                       |      |  |
| Positively Prepared?                         |                        |                                    |                     |                         |   | 6-3-4   |          |                                       |      |  |
| Justified?                                   |                        |                                    |                     |                         | THE PLAN IS BASED ON FLAWED METHODO                         |   |          |                                       |      |  |
| Effective?  Consistent with National Policy? |                        |                                    |                     |                         | THE PLAN IS NOT DELIVERABLE  IT DOES NOT COMPLY WITH NPPF26 |   |          |                                       |      |  |
| 0011313                                      | iterit witi            | Tradional Folk                     |                     |                         | Δ,  |   |          |                                       |      |  |
| or fa  | ails to co<br>u wish t | omply with th                      | e duty t            | to coopera              | te. Pleas   | Plan is not legally<br>se be as precise a<br>ndness of the Lo | s poss   | ible.                                 | ound |  |
| -  | HE PI                  | AN DOES                            | s No                | 7 SATI                  | 5F1   | THE FOLLOW  | NG       |                                       |      |  |
|  |                        |                                    |                     |                         |   | NABLE DEVE  |          | ENT                                   |      |  |
| 2 TH   | E CR                   | ITERIA FOR                         | 2 50                | STAINA                  | BUE T   | RANSFORT AS   | THE      | ZAN FROM                              |      |  |
| 3 50   | STAIN                  |                                    | SING                | , TARE                  | ETS (   | PROPOSED ARE  |          |                                       |      |  |
| 01   | ER T                   | DUSK CE                            | NITICE              | DEVEL                   | SPIMEN  | RATING ON G   | ET DA    | ENSITIES                              |      |  |
|  |                        |                                    |                     |                         |   | PICULTURAL L  |          |                                       |      |  |

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

ELDNOMIC GROWTH PREDICTIONS FOR ST. HELENS ARE BASED ON FLAWED HISTORICAL DATA THAT DOES NOT JUSTIFY THE ASPIRATIONAL TARGETS INCLUDED IN THE PLAN.

THE INCREASE IN TRAFFIC PROPOSED IN THE PLAN WILL HAVE A SIGNIFICANT IMPACT ON AIR QUALITY, NOISE TRANQUILITY AND GENERAL HEALTH IT DOES NOT PROMOTE LESS VEHICLE DEPENDENCY WITH ITS PROPOSALS FOR EDGE OF TOWN DEVELOPMENTS.

Please continue on a separate sheet if necessary

**Please note:** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

| 8. If your representation is seeki | ng a modification; do you consider it necessary to participate a |
|------------------------------------|--|
| the oral part of the examination   | n? (the hearings in public)                                      |
|                                    |  |

/

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.



# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

(For official use only)

Please also read the Representation Form Guidance Note that is available with this form, or online at: www.sthelens.gov.uk/localplan

Please ensure the form is returned to us by no later than 5pm on Wednesday 13th March 2019. Any comments received after this deadline cannot be accepted.

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

Varia Amentia Detaila (if applicable)

## PART A - YOUR DETAILS

we will contact you by your postal address.

Please note that you must complete Parts A and B of this form.

| (we will correspond via your agent)   | 2. Your Agent's Details (ii applicable)   |
|---|---|
| ,   | Title-  |
| Title:  |   |
| First Name: W1441A11  | First name:   |
|   | _ Last Name:  |
| Organisation/company:   | Organisation/company:   |
|   | Address:  |
|   | Postcode:   |
| Tel No:   | Tel No:   |
| Mobile No   | Mobile No:  |
| Email:  | imail:  |
| Signature:  | Date: 7 MAR 2019  |
| Please be aware that anonymous forms cannot be a considered you MUST include your details above.                            | ccepted and that in order for your comments to be   |
| Would you like to be kept updated of future stage (namely submission of the Plan for examination, pub adoption of the Plan) | es of the St Helens Borough Local Plan 2020-2035?<br>blication of the Inspector's recommendations and |
| Yes (via email)   | ☐ No  |
| Please note - email is the Council's preferred metho  | od of communication. If no email address is provided.   |

#### RETURN DETAILS

Please return your completed form to us by no later than 5pm on Wednesday 13th March 2019 by:

post to:

Local Plan

St.Helens Council

Town Hall

Victoria Square

St Helens WA10 1HP

or by hand delivery to:

Ground Floor Reception St. Helens Town Hall

(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

#### **FURTHER INFORMATION**

If you require further information please see the FAQs on our website: www.sthelens.gov.uk/localplan

If you still need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk

Telephone: 01744 676190

#### **NEXT STEPS**

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

### **DATA PROTECTION**

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: www.sthelens.gov.uk/localplan

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

## . PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

| 3. To which part of the Local Plan does this representation relate?   |                                       |                                |   |                                       |
|---|---------------------------------------|--------------------------------|---|---------------------------------------|
| Policy Paragraph/diagram  | Policies<br>Map                       | Ap<br>Str<br>En                | stainability<br>praisal/<br>ategic<br>vironmental<br>sessment | Habitats<br>Regulations<br>Assessment |
| Other documents (please name document and relevant part/sec   | etion) GRE                            | EN B                           | ELT REUIE   | w (2018)                              |
| 4. Do you consider the St Hele<br>Please read the Guidance no   | ens Borough Loc<br>te for explanation | cal Plan 2026<br>is of Legal C | <b>0-2035 is:</b><br>ompliance and the                        | Tests of Soundness                    |
| Legally Compliant?  |                                       | Yes                            | ☐ No  |                                       |
| Sound?  |                                       | Yes                            | U-NO  |                                       |
| Complies with the Duty to Coop  | erate                                 | Yes                            | ☐ No  |                                       |
| Please tick as appropriate  |                                       |                                |   |                                       |
| 5. If you consider the Local Pl<br>Please read the Guidance no  |                                       |                                |   |                                       |
| Positively Prepared?  |                                       | 4                              |   |                                       |
| Justified?  |                                       |                                |   |                                       |
| Effective?  |                                       |                                |   |                                       |
| Consistent with National Policy?  | ?                                     |                                |   |                                       |
| 6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.  If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments. |                                       |                                |   |                                       |
| PLEASE S  | EE AT                                 | TAC ET                         | ED SHE  | ET 1                                  |

| sugg  | pested revised wording   |  |  |  | <u> </u>  | · · · · · · · · · · · · · · · · · · ·  | <b>a</b>                                     |
|---|--|--|--|--|---|--|--|
|   |  |  |  |  | Diagon  |  |  |
| ease n  | <b>note:</b> your representation   | should cove  | er succino   | tly all the  |   | evidence and s   |  |
| formation<br>ill not nepresen<br>fter this                      | note: your representation on necessary to support, ormally be a subsequent station at the publication s stage, further submistes he/she identifies for | /justify the re<br>t opportunity<br>stage.<br>sions will be                            | presenta<br>to make<br>e only at                     | tion and<br>further re   | information<br>suggested r<br>presentatio                         | , evidence and s<br>nodification, as the<br>ns based on the                    | supporting<br>nere<br>original               |
| formation ill not not not present the second issues.  8. If you | on necessary to support, ormally be a subsequent tation at the publication sets stage, further submis  | /justify the re<br>t opportunity<br>stage.<br>sions will be<br>examinatio              | epresenta<br>to make<br>e only at<br>n.<br>ification | tion and<br>further re<br>the requ<br>; do you   | information suggested representation less of the less consider it | , evidence and s<br>nodification, as the<br>ns based on the<br>nspector, based | supporting<br>nere<br>original<br>on matters |
| formation ill not not not present the second issues.  8. If you | on necessary to support, ormally be a subsequent tation at the publication s stage, further submistes he/she identifies for ur representation is see   | /justify the retopportunity stage. sions will be examinatioeking a modition? (the head | epresenta<br>to make<br>e only at<br>n.<br>ification | the required the requirements the requirement the requirements the requirement the requirements the requirement the requirements the requirements the requirements the requireme | e information suggested representation est of the lectonsider it  | , evidence and s<br>nodification, as the<br>ns based on the<br>nspector, based | supporting nere original on matters          |

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

Adequate regional and cross border collaboration has not been undertaken. The Housing Need assessment does not use Standard Methodology, and no case for exceptional circumstances has been made.

The latest estimate produced by the ONS (2016) predicts that 383 houses per year will be required to meet housing need in St Helens. The Council are using an older forecast (2014) of 486.

The Plan makes no mention of Brownfield and Previously Developed Land (PDL) that is not (vet) available or included on the Brownfield Register.

The St Helens Council statement of "Contaminated Land (CL) sites" (2015) indicates that 3,170 ha of the lowest priority contaminated land exists in St Helens. Two Green Belt sites of 56.6 ha and 148 ha are being reclassified as safeguarded land sites and included to fulfil the housing need, much less than 7% of the 3,170-ha available, if it were to be remediated.

It is ridiculous to give up green belt land when so much brownfield land is available within the borough, land that should and can be remediated. As a former mining town to develop housing in the past, remediation has been required - examples are the former Providence Hospital site, the Cansfield Street laundry site and the home of the Shires housing development required extensive remediation - but it was done. Why should the council give up our heritage of the green belt to quick profit making housing developers and leave large plots of brownfield sites fallow. The plan should look to develop those brownfield sites with the housing developers part of the package includes the land remediation - look at what Knowsley Council have acheived with the former BICC sites, most of which were highly contaminated. It can be done if there is a willingness to do so.

The council in conjunction with Liverpool City Region Combined Authority (LCRCA) and neighbouring authorities have no policy for bringing 'unsuitable' sites outside the Brownfield Register back into use. It is not reasonable to assume that sites cannot be made available within the 15- year plan period or the 25-year safeguarded period being considered. Evidence as the examples identified above dictate otherwise.

The loss of Grade 1 and 2 Agricultural land that comprises most Allocated and Safeguarded sites is not mentioned. The negative impact on farming and distribution jobs is not considered.

The local road networks, health service, schools, policing, public transport, cannot support the massive expansion of housing into otherwise farming land.

The Plan is not effective.

SHEET 2

Retain all Green belt areas for the future of our communities.

Re-develop brownfield sites - it can be done and there is plenty of evidence within the existing projects in the borough and neighbouring authorities that are excellent examples of this, even ongoing ones now. If this action is not taken it will leave large areas of the borough barren brownfield deserted sites, whilst our beautiful green belt is gone for the benefit of house builders and the council wanting to make a quick profit rather than rejuvenating exiting brownfield sites.



## St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

(For official use only)

Please also read the Representation Form Guidance Note that is available with this form, or online at www.sthelens.gov.uk/localplan.

Please ensure the form is returned to us by no later than <u>5pm on Wednesday 13th March</u> <u>2019</u>. Any comments received after this deadline <u>cannot</u> be accepted.

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s).

6102 YAM E1 890

## PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

| 1. Your Details        | Your Agent's Details (if applicable) (we will correspond via your agent) |
|------------------------|--|
| Title: Mi 22           | Title:   |
| First Name: Christin a | First name:  |
| Last Name: Parr        | Last Name:   |
| Organisation/company:  | Organisation/company:  |
|                        | Address:   |
|                        | Postcode:  |
|                        | Tel No:  |
|                        | Mobile No:   |
|                        | Email:   |
|                        | •  |
| Signature:             | Date: 223.19.  |

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you MUST include your details above.

| Would you like to be kept update. Plan 2020-2035? (namely submission inspector's recommendations and a | on of the Plan for examination, publication of the Plan)                    |
|--|---|
| Yes (Via Email)  | No 🗌  |
| Please note - e-mail is the Council's address is provided, we will contact                             | preferred method of communication. If no e-mail you by your postal address. |

ATIC 8HS

O GENERAL

O LPADO

Representor Details

| Web Reference Number | WF0027                    |
|----------------------|---------------------------|
| Type of Submission   | Web submission            |
| Full Name            | Mrs Pauline Parr          |
| Organisation         | s i dullile Fall          |
| Address              | 25 Howards Lane Eccleston |
| Agent Details        | St Helens WA10 5HX        |

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

| Policy Policy   |               |
|---|---------------|
| Paragraph / diagram / table                                   | LPA05 & LPA06 |
| Policies Map  |               |
| Sustainability Appraisal / Strategic Environmental Assessment |               |
| Habitats Regulation Assessment                                |               |
| Other documents   |               |

4. Do you consider the St Helens Borough Local Plan 2020-2035:

| Is legally compliant?                | No | 1 |
|--------------------------------------|----|---|
| Is sound?                            | No |   |
| Complies with the duty to cooperate? | No |   |

# 5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

Not positively prepared because it is based on flawed predictions of future growth. With a falling local population, the decline of St Helens town centre and the availability of brownfield sites elsewhere within the borough, it is not sound policy to sacrifice greenbelt and productive farmland while the town exentre decays.

The local infrastructure has not been considered clearly. Local primary and secondary schools are already oversubscribed and there is nowhere to build more schools if this area is used for housing. Traffic issues are a major concern. The adjacent roads are residential and could not support an increase in traffic. Houghtons Lane is already quite treacherous for pedestrians. Pollution and noise would bedreadful in the new area of housing.

Not justified as 8HS is at present an area of Grade 1 & 2 agricultural land. As we face a possible exit from the EU, we need to retain as much farmland as we can in order to feed the population. Not effective because builing on 8HS is bringing houses to a town that is in dire need of regeneration

Not effective because builing on 8HS is bringing houses to a town that is in dire need of regeneration to keep the population already here. The families who might move into these new homes would be unlikely to work in St Helens and unlikely to shop in St Helens. There are many houses for sale in the area. Building so many new homes with out the need for them will make St Helens house-rich, but amemities-poor!





Not consistent with national policy because because there are brownfield sites available locally, which would be more suitable for housing development. National policy is that if brownfield sites are available, greenbelt should not be used for housing.

2

- 7. Please set out modification(s) you consider are necessary
  8HS shpuld be changed from 'safeguarded for development' and remain as green belt!
- 8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

|               | a /4.2 /2010 A.E.7.47 DM |
|---------------|--------------------------|
| Response Date | 3/13/2019 4:57:47 PM     |

#### **Representor Details**

| Web Reference Number | WF0299               |
|----------------------|----------------------|
| Type of Submission   | Web submission       |
| Full Name            | Dr Helen Parr        |
| Organisation         | Garswood Surgery     |
| Address              | Billinge Road        |
|                      | Garswood             |
|                      | Ashton-in Makerfield |
|                      | WN4 0XD              |
| Agent Details        |                      |

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

#### 3. To which part of the Local Plan does this representation relate?

|                                      | •  |
|--------------------------------------|--|
| Policy                               |  |
| Paragraph / diagram / table          |  |
| Policies Map                         |  |
| Sustainability Appraisal / Strategic | sustainability and strategic environmental |
| Environmental Assessment             | assessment                                 |
| Habitats Regulation Assessment       |  |
| Other documents                      |  |

## 4. Do you consider the St Helens Borough Local Plan 2020-2035:

| Is legally compliant?                | No |
|--------------------------------------|----|
| Is sound?                            | No |
| Complies with the duty to cooperate? | No |

#### 5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared

# 6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

Garswood Surgery is situated adjacent to both proposed housing developments. These combined views are from the GP partners and staff of the surgery

- Garswood Surgery was not consulted regarding their capacity to accept a large influx of patient registrations
- Garswood Surgery is already at maximum capacity for the number of clinicians. We are not aware of any other GP practices that would have these houses in their practice boundaries certainly no St Helens CCG practices
- Potential retirement of GP at neighbouring surgery has led to increase in numbers of patients requesting to register at Garswood Surgery
- There is a current, unresolved issue, with transfer of medical records from patients transferring from a neighbouring surgery to Garswood Surgery. This is compromising patients' safety of care.
- Safety of patient care would be further compromised if there was a large influx of patients (this includes those patients transferring from neighbouring surgery). This is likely to necessitate an application to close the list.

• St Helens borough has an ongoing, well recognised problem with the recruitment and retention of GP's and other clinical staff in primary care. Recruitment of new GP's for Garswood and the neighbouring surgery may not be possible – again, impacts on safety

### 7. Please set out modification(s) you consider are necessary

- Primarily funding to cover large increase list size which would broadly need to cover;
- Recruitment of additional clinical and administration staff
- Training of staff
- Interim salaries of these staff until list size increases
- Increase rental cost in the building more rooms will be required. Of note, we believe this to be substantial increase cost
- 2. Support for the neighbouring practice to enable them to maintain their current patient list to prevent further impact on our practice list.
- 3. CCG to reduce practice boundary for Garswood Surgery

# 8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

Yes, I wish to participate at the oral examination

# 9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

As a Practice, we need have sound and sensible discussions regarding safe and effective measures that can potentially be put into place if any new housing developments were to go ahead.

|               | 1                   |
|---------------|---------------------|
| Response Date | 3/8/2019 3:24:50 PM |



# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

(For official use only)

Please also read the Representation Form Guidance Note that is available with this form, or online at www.sthelens.gov.uk/localplan.

Please ensure the form is returned to us by no later than 5pm on Monday 13th May 2019. Any comments received after this deadline cannot be accepted.

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s).

PART A - YOUR DETAILS

1 3 MAY 2218

Please note that you must complete Parts A and B of this form.

| (we will correspond via your agent) Title: First name: |
|--|
|  |
|  |
| Last Name:   |
| Organisation/company:                                  |
| Address:   |
|  |
| Postcode:  |
| Tel No:  |
| Mobile No:   |
| Email:   |
| -  |
| ate: 12/05/19  |
|  |

comments to be considered you MUST include your details above.

| Would you like to be kept updated of future stages of the St Helens B Plan 2020-2035? (namely submission of the Plan for examination, publical Inspector's recommendations and adoption of the Plan) | orough Local |
|--|--------------|
| No No  |              |
| Please note - e-mail is the Council's preferred method of communication. address is provided, we will contact you by your postal address.  | lf no e-mail |

## **RETURN DETAILS**

Please return your completed form to us by no later than 5pm on Monday 13th May 2019 by:

post to:

**Local Plan** 

St. Helens Council

**Town Hall** 

Victoria Square

St.Helens Merseyside WA10 1HP

or by hand delivery to:

Ground Floor Reception, St. Helens Town Hall (open Monday-

Friday 8:30am - 5:15pm)

or by e-mail to:

planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

## **FURTHER INFORMATION**

If you require further information please see the FAQs on our website at <a href="https://www.sthelens.gov.uk/localplan">www.sthelens.gov.uk/localplan</a>. If you still need assistance, you can contact us via:

Email:

planningpolicy@sthelens.gov.uk

Telephone:

01744 676190

#### **NEXT STEPS**

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

## **DATA PROTECTION**

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website at <a href="https://www.sthelens.gov.uk/localplan">www.sthelens.gov.uk/localplan</a>.

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete <u>PART B</u> of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

(401)

17, hester Drive Eccleston Sr. Helens WAIO SEX 6 March 2019.

To Whomat may concern.

Re- Local Plan 345 - Land South of A580 between Houghhour hane - Crantack Grove Windle

I wish to register my objection to this land being removed from the Green Belt.

- O'The National Policy states that Green Bell should only be used as a last resort. St Helens has many Brownheid be used as a last resort. St Helens have many Brownheid Sites which could be developed. These herve not been properly surveyed in order to bring them back with when properly surveyed in order to bring them back would repund hat Most of These are near the town certae which would repund he it instead of going into decime.
- (2) The Councils own figures on Housing requirements is much more than is recorded. These houses will be owned by people who work well away from the centre and it will become who work well away from the centre and it will become a feeder town for other more prospective areas.
- (3) With the prediction of food shorteges this band is prime agricultural land which will continue to produce local food.

  agricultural land which will continue to produce local food.

  This not only cuts down on transport costs but gives the large the apportunity to walk to see crops strowing and children the apportunity to walk to see crops strowing and encourage them to do the same.
- (4) The plan has no suggestion as to how the hundreds of houses will cope with the transport around the area. This area is already congested a Windle Island and Itoughtonshow springfield have A thousand more cars will make they area one of the most polluled and cosisted in the country. The impact on people's health will make this an unhealthy area.

(5) There are no plans for amenties for the area. The schools are already full, there is very little medical provision in the area and no stops or social areas. People will have to be car dependent to live here.

The state of the s

The sale and the sale and sale and sale

The state of the s

Little Di - Mi Colle Di - Mi C

in region of the property of the property of the state of

about the same of the same of the same in the same is

The second secon

HE have sent will from the secretary and the sent of the

Med - I List and I was block the country to the

who it was being on it the word has

the state of the s

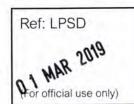
Your sincerely

(Ms)

Phase will I be kept via post informed of further prosuces, The survive profit of the seal of



# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form



Please also read the **Representation Form Guidance Note** that is available with this form, or online at: www.sthelens.gov.uk/localplan

Please ensure the form is returned to us by no later than 5pm on Wednesday 13th March 2019. Any comments received after this deadline cannot be accepted.

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

## PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

| Your Details     (we will correspond via your agent)  | 2. Your Agent's Details (if applicable)  |
|---|--|
|   | Title:   |
|   | First name:  |
|   | _ Last Name:   |
|   | _ Organisation/company:  |
|   | Address:   |
| Postcode: WW4 OUE   | Postcode:  |
| Tel No:   | Tel No:  |
| Mobile No:  | Mobile No:   |
|   | Email:   |
| Please be aware that anonymous forms cannot be a  | Date: 20.02.19 accepted and that in order for your comments to be                                  |
| considered you MUST include your details above.   | as of the St Helens Berough Local Plan 2020-20352  |
| (namely submission of the Plan for examination, put adoption of the Plan)                         | es of the St Helens Borough Local Plan 2020-2035? olication of the Inspector's recommendations and |
| Yes (via email)   | I OKO  |
| Please note - email is the Council's preferred method we will contact you by your postal address. | od of communication. If no email address is provided,  |

### RETURN DETAILS

Please return your completed form to us by no later than 5pm on Wednesday 13th March 2019 by:

post to:

Local Plan

St. Helens Council

Town Hall Victoria Square St Helens WA10 1HP

or by hand delivery to:

Ground Floor Reception St. Helens Town Hall

(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

#### FURTHER INFORMATION

If you require further information please see the FAQs on our website: www.sthelens.gov.uk/localplan

If you still need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk

Telephone: 01744 676190

#### **NEXT STEPS**

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

#### DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: www.sthelens.gov.uk/localplan

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

## . PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

| Policy   |  | Paragraph/   | Policies                              |         | Sustainability   | Habitats                      |
|----------|--|--|---------------------------------------|---------|--|-------------------------------|
| lolloy   | 10   | diagram  | Мар                                   | Carr    | A  | Regulations                   |
|          | LP   | table  |                                       | 9472540 | Strategic  | Assessment                    |
|          | 11-1   | SITE   | SITE                                  |         | Environmental  |                               |
|          | 405  | SITE<br>I HA   | 113                                   |         | Assessment   |                               |
|          |  | ts (please name relevant part/section)                         |                                       |         |  |                               |
| _        |  | ider the St Helens B<br>he Guidance note for                   |                                       |         | 2020-2035 is:<br>al Compliance and th                              | e Tests of Soundnes           |
| Legally  | Complia  | ant?   |                                       | Yes     | □ No   |                               |
| Sound    | ?  |  |                                       | Yes     | No   |                               |
| Compli   | ies with t   | he Duty to Cooperate   |                                       | Yes     | No No  |                               |
| Please   | tick as a  | ppropriate   | _                                     |         |  |                               |
| Justifie |  |  |                                       |         |  |                               |
| Effectiv |  | N. C. ID. C.   |                                       |         |  |                               |
| 0011313  | terit with   | National Policy?   |                                       | LY      |  |                               |
| or fa    | ils to co<br>u wish to<br>this box<br>ene a<br>l alion | support the legal of to set out your come all the is in declar | o cooperate compliance ments.  Peeple | or soun | lan is not legally cone be as precise as pode dness of the Local F | Plan, please also  St. Helens |
| popu     | us de  | ertroy green   | Belt 2                                | Land    | when develop   | to brown                      |
| w2       | ein  | Tell allo  |                                       |         | / / *  |                               |
| who who  | y de   | stroy green 3  |                                       |         |  |                               |
| who wie  | ed lif   | stroy green &  | eady wh                               | ant of  | rehood place   | es, doctors nu                |
| who wie  | ed life alice  | stroy green &  | vices. (                              | cart of | will be necessed congestion  | es, doctors nu<br>sam beauce  |

necessary because of Lack of facilities - coming more congestion

chares will be inadequate. Council Tax payers whould not be liable for this. Developers must be responsible for this

MODIFICATIONS - Pleane delete this land from the proposed removal from the greenbelt.

| r you have identified at 6. above where this non-compliance with the duty to cooperate is will need to say why this modification will make I be helpful if you are able to put forward your t. Please be as precise as possible. |
|--|
| teen mentioned for celibis for eport,  |
| Please continue on a separate sheet if necessary   |
| the request of the Inspector, based on matters ; do you consider it necessary to participate at in public)   |
| Yes, I wish to participate at the oral examination   |
| examination, please outline why you consider   |
|  |

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.



# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form



Please also read the **Representation Form Guidance Note** that is available with this form, or online at: www.sthelens.gov.uk/localplan

Please ensure the form is returned to us by no later than 5pm on Wednesday 13th March 2019. Any comments received after this deadline cannot be accepted.

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

## PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

| Your Details     (we will correspond via your agent)  | 2. Your Agent's Details (if applicable)               |
|---|---|
|   | Title:  |
| First Name: MAUREEN   | First name:   |
|   | Last Name:  |
|   | Organisation/company:                                 |
| Address: 79 MAMILTON ROAD SARSWOOD  | Address:  |
| Postcode: WIFAN WN4 OUE   | Postcode:   |
| Tel No:   | Tel No:   |
| Mobile No:  | Mobile No:  |
| Email:  | Email:  |
| Signature:  | Date: 20-02-19  |
| Please be aware that anonymous forms cannot be a considered you MUST include your details above.                                | accepted and that in order for your comments to be    |
| Would you like to be kept updated of future stag<br>(namely submission of the Plan for examination, pu<br>adoption of the Plan) | blication of the Inspector's recommendations and      |
| Yes (via email)   | No  |
| Please note - email is the Council's preferred meth   | od of communication. If no email address is provided, |

#### RETURN DETAILS

Please return your completed form to us by no later than 5pm on Wednesday 13th March 2019 by:

post to:

Local Plan

St. Helens Council

Town Hall Victoria Square

St Helens WA10 1HP

or by hand delivery to:

Ground Floor Reception St. Helens Town Hall

(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

#### **FURTHER INFORMATION**

If you require further information please see the FAQs on our website: www.sthelens.gov.uk/localplan

If you still need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk

Telephone: 01744 676190

#### **NEXT STEPS**

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

#### DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: www.sthelens.gov.uk/localplan

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

## **PART B - YOUR REPRESENTATION**

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

| 3. To which  | h part of the Local Pla                        | an does this repres                               | sentation relate?  |                                       |
|--|--|---|--|---------------------------------------|
| Policy<br>PO   | Paragraph/<br>diagram<br>table                 | Policies Map SITE I H S                           | Sustainability Appraisal/ Sum Strategic Environmental Assessment                 | Habitats<br>Regulations<br>Assessment |
|  | uments (please name<br>and relevant part/secti | ion)  |  |                                       |
| <b>4. Do you</b> e                                     | consider the St Helen<br>ead the Guidance note | s Borough Local F<br>e for explanations of        | Plan 2020-2035 is:<br>Legal Compliance and t                                     | he Tests of Soundness                 |
| Legally Co   | mpliant?                                       |   | res □ No   |                                       |
| Sound?   |  | Ů,  | res No   |                                       |
| Complies   | with the Duty to Coope                         | rate  | res No   |                                       |
| Please tick  | as appropriate                                 |   |  |                                       |
| Positively F<br>Justified?<br>Effective?<br>Consistent | Prepared?  t with National Policy?             |   |  |                                       |
| or fails   | to comply with the du                          | ity to cooperate. <u>P</u><br>gal compliance or s | cal Plan is not legally co<br>lease be as precise as p<br>soundness of the Local | oossible.                             |
| When popul   | re are all ation is is dertroy go              | the people<br>n decline<br>een Belt               | Land when  | doing no wil                          |
| 1 22   | dertroy gr                                     | ren 15 ell a                                      |  |                                       |

| rela<br>inca<br>the                     | lease set out what modification(s) you consider necessary to make the Local Plan legally ompliant or sound, having regard to the matter you have identified at 6. above where this elates to soundness (NB please note that any non-compliance with the duty to cooperate capable of modification at examination). You will need to say why this modification will need to say why this modification will be Local Plan legally compliant or sound. It will be helpful if you are able to put forward you agree to be as precise as possible. | is<br>make |
|---|---|------------|
|   | See addétainelsheit.  |            |
|   | Please continue on a separate sheet if ne   | cessa      |
| format<br>ill not i<br>prese<br>fter th | e note: your representation should cover succinctly all the information, evidence and supporting ation necessary to support/justify the representation and suggested modification, as there at normally be a subsequent opportunity to make further representations based on the original sentation at the publication stage.  This stage, further submissions will be only at the request of the Inspector, based on materials and the sentation.  |            |
| 8. If yo                                | your representation is seeking a modification; do you consider it necessary to participat e oral part of the examination? (the hearings in public)  | e at       |
| V                                       | No, I do not wish to participate at the oral examination  Yes, I wish to participate at the oral examination  |            |
|   |   |            |
|   | you wish to participate at the oral part of the examination, please outline why you considers to be necessary:  | der        |
|   |   | der        |
|   |   | der        |
|   |   | der        |

Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

1800756M

MAUREEN PATE

6. There is no mention of common ground with neighbouring authorities. This must be taken into account.

BOYT, MODIFICATIONS - Please Delete this Land from the greenbelt.

The proposed removal from the greenbelt.



## St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at <a href="https://www.sthelens.gov.uk/localplan">www.sthelens.gov.uk/localplan</a>.

Please ensure the form is returned to us by no later than <u>5pm on Monday 13<sup>th</sup> May 2019</u>. Any comments received after this deadline <u>cannot</u> be accepted.

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s).

1 3 MAY 2019

## PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

| 1. Your Details   | Your Agent's Details (if applicable)  (we will correspond via your agent) |
|---|---|
| Title: M/L  | Title:  |
| First Name: ARTHUR  | First name:   |
| Last Name:<br>PATIENDEN   | Last Name:  |
| Organisation/company:   | Organisation/company:   |
| Address: 32 LOTUS GARDENS BOLD STHEZENS MERSEYSIDE                                    | Address:  |
| Postcode: WAG 4 EB  | Postcode:   |
| Tel No:   | Tel No:   |
| Mobile No:  | Mobile No:  |
| Email:  | Email:  |
| Signature:  | Date: 30. 4 2019  |
| ease be aware that anonymous forms cann<br>mments to be considered you MUST includ    |   |
| Plan 2020-2035? (namely submission of the<br>Inspector's recommendations and adoption | of the Plan)  |
|   | * • • • • • • • • • • • • • • • • • • •                                   |
| Yes 🔲 (Via Email)   | No 🗌  |



# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

(For official use only)

Please also read the Representation Form Guidance Note that is available with this form, or online at <a href="https://www.sthelens.gov.uk/localplan">www.sthelens.gov.uk/localplan</a>.

Please ensure the form is returned to us by no later than <u>5pm on Monday 13<sup>th</sup> May 2019</u>. Any comments received after this deadline <u>cannot</u> be accepted.

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s).

## **PART A - YOUR DETAILS**

13 MAY 2019

Please note that you must complete Parts A and B of this form.

| 1. Your Details                        | 2. Your Agent's Details (if applicable)   |
|--|---|
| Tale                                   | (we will correspond via your agent)   |
| Title: M25                             | Title:  |
| First Name:<br>GERTRUD                 | First name:   |
| Last Name:                             | Last Name:  |
| PATTENDEN                              | Last Ivalire.   |
| Organisation/company:                  | Organisation/company:   |
| Address: 32 Lotos GARDAN BOLD ST HELEN |   |
| BOLD ST HELEN<br>MERSEY SIDE           |   |
| Postcode: WAY 4EB Tel No:              | Postcode:   |
|  | Tel No:   |
| Mobile No:                             | Mobile No:  |
| Email:                                 | Email:  |
| Signature:                             | Date: 30 4. 2019  |
|  | torms cannot be accepted and that in order for your WUST include your details above.    |
|  | dated of future stages of the St Helens Borough Local                                   |
|  | nission of the Plan for examination, publication of the                                 |
| Inspector's recommendations a          |   |
| Yes (Via Email)                        | No 🗌  |
|  | ncil's preferred method of communication. If no e-mail nact you by your postal address. |

**Representor Details** 

| Web Reference Number | WF0166                |
|----------------------|-----------------------|
| Type of Submission   | Web submission        |
| Full Name            | Mrs Suzanne Pattenden |
| Organisation         |                       |
| Address              | 12 The Pastures       |
|                      | St Helens WA9 4ZB     |
| Agent Details        |                       |

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

### 4. Do you consider the St Helens Borough Local Plan 2020-2035:

| Is legally compliant?                | Yes |
|--------------------------------------|-----|
| Is sound?                            | Yes |
| Complies with the duty to cooperate? | No  |

### 5. If you consider the Local Plan is unsound, it because it is not:

Effective

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

My view is in line with and the same as that of Bold and Clock Face Action Group

7. Please set out modification(s) you consider are necessary

My view is in line with and the same as that of Bold and Clock Face Action Group

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

| Response Date | 3/12/2019 7:33:54 PM |
|---------------|----------------------|



## St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at <u>www.sthelens.gov.uk/localplan</u>.

Please ensure the form is returned to us by no later than <u>5pm on Wednesday 13th March</u> <u>2019</u>. Any comments received after this deadline <u>cannot</u> be accepted.

This form has two parts;

Part A - Personal Details

Part B – Your Representation(s).

## **PART A - YOUR DETAILS**

Please note that you must complete Parts A and B of this form.

| 1. Your Details   | Your Agent's Details (if applicable) (we will correspond via your agent) |
|---|--|
| Title: MC-S   | Title:   |
| First Name: BARBARA   | First name:  |
| Last Name: PATTERSON  | Last Name:   |
| Organisation/company:   | Organisation/company:  |
| Address: 46.CRAWFORD ST<br>CLOCK FACE, ST. HELENS<br>MENSEYSIDE | Address:   |
| Postcode: WA9 4x4.  | Postcode:  |
|   | Tel No:  |
|   | Mobile No:   |
|   | Email:   |
|   |  |
| Signature:  | Date: 11/3/20.   |

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you MUST include your details above.

|                    | nted of future stages of the St Helens Borough Local<br>ission of the Plan for examination, publication of the<br>d adoption of the Plan) |  |
|--------------------|---|--|
| Yes [] (Via Email) | No 🗌  |  |

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

### RETURN DETAILS

Please return your completed form to us **by no later than <u>5pm on Wednesday 13<sup>th</sup> March</u> <u>2019</u> by:** 

post to:

Local Plan

St. Helens Council

Town Hall

Victoria Square

St.Helens Merseyside WA10 1HP

or by hand delivery to:

Ground Floor Reception, St. Helens Town Hall (open Monday-

Friday 8:30am - 5:15pm)

or by e-mail to:

planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

### FURTHER INFORMATION

If you require further information please see the FAQs on our website at <a href="https://www.sthelens.gov.uk/localplan">www.sthelens.gov.uk/localplan</a>. If you still need assistance, you can contact us via:

Email:

planningpolicy@sthelens.gov.uk

Telephone:

01744 676190

### **NEXT STEPS**

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

#### DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website at <a href="https://www.sthelens.gov.uk/localplan">www.sthelens.gov.uk/localplan</a>.

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete <u>PART B</u> of this form, setting out your representation/comment.



## St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

(For official use only):

Please also read the Representation Form Guidance Note that is available with this form, or online at www.sthelens.gov.uk/localplan.

Please ensure the form is returned to us by no later than 5pm on Wednesday 13th March 2019. Any comments received after this deadline cannot be accepted.

This form has two parts:

Part A - Personal Details

Part B - Your Representation(s).

### PART A - YOUR DETAILS

Yes (Via Email)

Inspector's recommendations and adoption of the Plan)

| 1. Your Details  | Your Agent's Details (if applicable)  (we will correspond via your agent) |
|--|---|
| Γitle: Μ'κ   | Title:  |
| First Name: ROYMOND  | First name:   |
| ast Name: PATTERSON  | Last Name:  |
| Organisation/company:  | Organisation/company:   |
| Address: 46. CRAWFORD ST<br>CLOCK FREDINGINEYSIDE<br>ST. HELENS MENSEYSIDE           | Address:  |
| CLOCK FACENSIDE  |   |
| Postcode: WARLYXH  | Postcode:   |
|  | Tel No:   |
|  | Mobile No:  |
|  | Email:  |
| Signature:   | Date: 11\3\20.  |
| ease be aware that anonymous forms cannot mments to be considered you MUST include a |   |
| mments to be considered you MUST include y   | our details above.  |

No 🗍

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

## **RETURN DETAILS**

Please return your completed form to us by no later than <u>5pm on Wednesday 13<sup>th</sup> March</u> <u>2019</u> by:

post to:

Local Plan

St.Helens Council

Town Hall

Victoria Square

St.Helens Merseyside WA10 1HP

or by hand delivery to:

Ground Floor Reception, St. Helens Town Hall (open Monday-

Friday 8:30am - 5:15pm)

or by e-mail to:

planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

### **FURTHER INFORMATION**

If you require further information please see the FAQs on our website at www.sthelens.gov.uk/localplan. If you still need assistance, you can contact us via:

Email:

planningpolicy@sthelens.gov.uk

Telephone:

01744 676190

### **NEXT STEPS**

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

### **DATA PROTECTION**

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website at <a href="https://www.sthelens.gov.uk/localplan">www.sthelens.gov.uk/localplan</a>.

Many thanks for taking the time to fill out this form, your co-operation is gratefully received.

Now please complete <u>PART B</u> of this form, setting out your representation/comment.



# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

(For official use only)

Please also read the Representation Form Guidance Note that is available with this form, or online at: www.sthelens.gov.uk/localplan

Monday 13th May 2019 Please ensure the form is returned to us by no later than 5pm on Any comments received after this deadline cannot be accepted.

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

1 3 MAY 2019

## PART A - YOUR DETAILS

we will contact you by your postal address.

Please note that you must complete Parts A and B of this form.

| 1. Your Details (we will correspond via your agent)   | 2. Your Agent's Details (if applicable)  |
|---|--|
| Title: mrs  | Title:   |
| First Name: JEAN  | First name:  |
|   | Last Name:   |
|   | Organisation/company:  |
| Address:  | Address:   |
| Postcode: WA949J  | Postcode:  |
| Tel No:   | Tel No:  |
| Mobile No:  | Mobile No:   |
| Email:  | Email:   |
| Signature:  | Date: 13 may 2019  |
| Please be aware that anonymous forms cannot be acconsidered you MUST include your details above.                            | ccepted and that in order for your comments to be  |
| Would you like to be kept updated of future stage (namely submission of the Plan for examination, pub adoption of the Plan) | s of the St Helens Borough Local Plan 2020-2035? lication of the Inspector's recommendations and |
| Yes (via email)   | ☐ No   |
| Places note - email is the Council's preferred metho  | d of communication. If no email address is provided,   |

#### **RETURN DETAILS**

Please return your completed form to us by no later than 5pm on Monday 13th May 2019 by

post to:

\_ocal Plan

St.Helens Council

Town Hall Victoria Square St Helens WA10 1HP

or by hand delivery to:

Ground Floor Reception St. Helens Town Hall

(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

### **FURTHER INFORMATION**

If you require further information please see the FAQs on our website: www.sthelens.gov.uk/localplan

If you still need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk

Telephone: 01744 676190

### **NEXT STEPS**

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

#### **DATA PROTECTION**

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: www.sthelens.gov.uk/localplan

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

## **PART B - YOUR REPRESENTATION**

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

| 3. To w  | hich part of the Local Pl                                   | an does this r                            | epresenta                 | tion relate?   |                                       |
|----------|---|---|---------------------------|--|---------------------------------------|
| Policy   | Paragraph/<br>diagram<br>table                              | Policies<br>Map                           |                           | Sustainability Appraisal/ Strategic Environmental Assessment | Habitats<br>Regulations<br>Assessment |
|          | documents (please name<br>ent and relevant part/sec         | tion)                                     |                           |  |                                       |
| 4. Do y  | <b>You consider the St Hele</b><br>se read the Guidance not | ns Borough Lo<br>e for explanatio         | ocal Plan 2<br>ons of Leg | 2020-2035 is:<br>al Compliance and the                       | e Tests of Soundness                  |
| Legally  | / Compliant?  |   | ☐ Yes                     | ☐ No   |                                       |
| Sound    | ?   |   | ☐ Yes                     | ☐ No   |                                       |
| Compl    | ies with the Duty to Coope                                  | erate                                     | Yes                       | ☐ No   |                                       |
| Please   | tick as appropriate   |   |                           |  |                                       |
| 5. If yo | ou consider the Local Pla<br>se read the Guidance not       | an is <u>unsound,</u><br>e for explanatio | , is it beca              | use it is not:<br>Tests of Soundness                         |                                       |
| Positiv  | ely Prepared?   |   |                           |  |                                       |
| Justifie | ed?   |   |                           |  |                                       |
| Effecti  | ve?   |   |                           |  |                                       |
| Consis   | stent with National Policy?                                 |   |                           |  |                                       |
| or fa    | ase give details of why y<br>ails to comply with the d      | uty to coopera<br>gal complianc           | ate. <u>Pleas</u> e       | e be as precise as po  | ossible.                              |
| use      | this box to set out your                                    | comments.                                 |                           |  |                                       |
|          |   |   |                           |  |                                       |
|          |   |   |                           |  |                                       |
|          |   |   |                           |  |                                       |
|          |   |   |                           |  |                                       |
|          |   |   |                           |  |                                       |
|          |   |   |                           |  |                                       |
|          |   |   |                           |  |                                       |
|          |   |   |                           |  |                                       |

| succinctly all the information, evidence and supporting resentation and suggested modification, as there is make further representations based on the original confly at the request of the Inspector, based on matters cation; do you consider it necessary to participate at rings in public) |
|---|
| Yes, I wish to participate at the oral examination  |
| of the examination, please outline why you consider   |
|   |

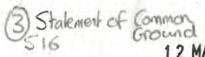
indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.



1 - LPAOS 2 - LPAO6



1 2 MAR 2019

Ref: LPSD

(For official use only)

# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Please also read the Representation Form Guidance Note that is available with this form, or online at: www.sthelens.gov.uk/localplan

Please ensure the form is returned to us by no later than 5pm on Wednesday 13th March 2019. Any comments received after this deadline cannot be accepted.

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

## PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

| Your Details     (we will correspond via your agent)  | 2. Your Agent's Details (if applicable)  |
|---|--|
|   | Title:   |
| First Name: Accepted  | First name:  |
| Mar makes Cocco   | Last Name:   |
| Last Name:  | Organisation/company:  |
| Organisation/company:   | . Organisation/company.  |
| Address: 4 Femea Gove   | Address:   |
|   |  |
| Postcode: WNY ORF.  | Postcode:  |
|   | Tel No:  |
|   | Mobile No:   |
|   | Email:   |
|   |  |
| Signature:  | Date: 5/3/19   |
| Please be aware that anonymous forms cannot be a considered you MUST include your details above.                            |  |
| Would you like to be kept updated of future stage (namely submission of the Plan for examination, pub adoption of the Plan) | es of the St Helens Borough Local Plan 2020-2035?<br>Dication of the Inspector's recommendations and |
| Yes (via email)   | ☑ No   |
| Please note - email is the Council's preferred metho  | od of communication. If no email address is provided,  |

#### **RETURN DETAILS**

Please return your completed form to us by no later than 5pm on Wednesday 13th March 2019-by:

post to:

Local Plan

St. Helens Council

Town Hall

Victoria Square

St Helens

**WA10 1HP** 

or by hand delivery to:

Ground Floor Reception St.Helens Town Hall

(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

## **FURTHER INFORMATION**

If you require further information please see the FAQs on our website: www.sthelens.gov.uk/localplan

If you still need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk

Telephone: 01744 676190

#### **NEXT STEPS**

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

### **DATA PROTECTION**

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: www.sthelens.gov.uk/localplan

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

## PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

| Policy<br>IHA<br>LPAS                        | Paragraph/diagram table   | Policies<br>Map  | App<br>Stra<br>Envi | tainability<br>braisal/<br>tegic<br>ronmental<br>essment | Habitats<br>Regulations<br>Assessment |
|--|---|--|---------------------|--|---------------------------------------|
|  | nts (please name<br>relevant part/sectio  | n)   | Section (Section )  | 100010   |                                       |
|  | ider the St Helens<br>he Guidance note f  | The second secon |                     |  | ne Tests of Soundness                 |
| Legally Complia                              | ant?  |  | ] Yes               | No   |                                       |
| Sound?                                       |   |  | ] Yes               | HO.  |                                       |
| Complies with t                              | he Duty to Coopera  | te [   | ] Yes               | ☐ No   |                                       |
| Please tick as a                             | ppropriate  |  |                     |  |                                       |
| Positively Prepa<br>Justified?<br>Effective? | he Guidance note for red?  National Policy?   | or explanations  | of the Tests        | of Soundness   |                                       |
| or fails to co                               | details of why you<br>mply with the duty<br>o support the legal<br>to set out your co | to cooperate.  | Please be a         | s precise as po  |                                       |
|  |   | greenso  | it w                | n can  | e Signification                       |

| mation necessary ot normally be a s esentation at the p r this stage, furth issues he/she ide | esentation should cover suc<br>to support/justify the repres<br>ubsequent opportunity to m<br>ublication stage. | sinctly all the inform |   |             |
|---|---|------------------------|---|-------------|
| mation necessary ot normally be a s esentation at the p this stage, furth issues he/she ide   | to support/justify the represubsequent opportunity to m   | sinctly all the inform | nation, evidence and                      |             |
| ne oral part of the   | tion is seeking a modifica<br>e examination? (the hearing<br>wish to participate                                | gs in public)          | ler it necessary to to participate at the |             |
| at the oral ex  |   | examinatio             |   | . Oral      |
| you wish to par<br>his to be necessa  | icipate at the oral part of<br>iry:   | ne examination, pl     | ease outline why y                        | you conside |

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

## PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

| Policy Paragraph/ diagram table  LP A06 Billige &   | Policies<br>Map                                  | Sustainability Appraisal/ Strategic Environmental Assessment | Habitats<br>Regulations<br>Assessment |
|---|--|--|---------------------------------------|
| Other documents (please name document and relevant part/section   | on)  |  |                                       |
| 4. Do you consider the St Helens Please read the Guidance note  |  |  | the Tests of Soundness                |
| Legally Compliant?  | ПУ   | es No  |                                       |
| Sound?  | _ Y  | es No  |                                       |
| Complies with the Duty to Coopera   | ate Y  | es No  |                                       |
| Please tick as appropriate  |  |  |                                       |
| Please read the Guidance note the Positively Prepared? Justified? Effective? Consistent with National Policy?                               | Q<br>Q<br>Q<br>Q<br>Q                            |  |                                       |
| 6. Please give details of why you<br>or fails to comply with the duty<br>If you wish to support the lega<br>use this box to set out your co | / to cooperate. <u>Ple</u><br>I compliance or so | ease be as precise as p                                      | ossible.                              |
|   | ( .  |  | -                                     |

Delve (a) four proposed removed or gear bet



# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

(For official use only)

Please also read the Representation Form Guidance Note that is available with this form, or online at: www.sthelens.gov.uk/localplan

Please ensure the form is returned to us by no later than 5pm on Wednesday 13th March 2019. Any comments received after this deadline cannot be accepted.

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

## PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

| 1. Your Details   | 2. Your Agent's Details (if applicable)  |
|---|--|
| (we will correspond via your agent)   | Title  |
|   | Title:   |
| _   | First name:  |
| Last Name: PEARSO N   | Last Name:   |
|   | Organisation/company:  |
| Address: 57 Birch Grove  Alhton in Makefield  | Address:   |
| Postcode: NN 4 O QX   | Postcode:  |
| Tel No:   | Tel No:  |
| Mobile No   | Mobile No:   |
|   | Email:   |
| Signature:  | Date: 10/3/19  |
| Please be aware that anonymous forms cannot be a considered you MUST include your details above.                            | accepted and that in order for your comments to be   |
| Would you like to be kept updated of future staged (namely submission of the Plan for examination, puladoption of the Plan) | es of the St Helens Borough Local Plan 2020-2035? blication of the Inspector's recommendations and |
| Yes (via email)   | ☐ No   |

Please note - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address. 1 view at http://www.legislation.gov.uk/ukpga/2004/5/contents

### **RETURN DETAILS**

Please return your completed form to us by no later than 5pm on Wednesday 13th March 2019 by:

post to:

Local Plan

St.Helens Council

Town Hall

Victoria Square

St Helens WA10 1HP

or by hand delivery to:

Ground Floor Reception

St. Helens Town Hall

(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

#### **FURTHER INFORMATION**

If you require further information please see the FAQs on our website: www.sthelens.gov.uk/localplan

If you still need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk

Telephone: 01744 676190

#### **NEXT STEPS**

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

#### DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: www.sthelens.gov.uk/localplan

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

## **PART B - YOUR REPRESENTATION**

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

| 3. To w  | hich pa   | rt of the Loca   | l Plan c   | loes this re   | present           | ation relate?  |  |
|--|---|--|--|--|-------------------|--|--|
| Policy<br>Lp<br>A<br>05  | sire<br>1<br>H<br>A   | Paragraph/<br>diagram<br>table   |  | Policies<br>Map  |                   | Sustainability Appraisal/ Strategic Environmental Assessment   | Habitats<br>Regulations<br>Assessment  |
| Other o  |   | nts (please nar<br>relevant part/s   |  |  |                   |  |  |
|  |   |  |  |  |                   | <b>2020-2035 is:</b><br>gal Compliance and   | the Tests of Soundness   |
| Legally  | / Compli  | ant?   |  |  | Yes               | No   |  |
| Sound  | ?   |  |  |  | ☐ Yes             | <b>☑</b> No  |  |
| Compli   | ies with t  | he Duty to Co  | operate  |  | Yes               | No   |  |
| Please   | tick as a   | ppropriate   |  |  |                   |  |  |
| Justifie<br>Effectiv   | ve?   | National Polic   | :y?  |  |                   |  |  |
| or fa<br>If you<br>use<br>Not July<br>The pop<br>the ex<br>One of<br>encoura<br>encoura<br>the leading<br>surger | ails to co<br>u wish t<br>this box<br>enfect<br>enfect<br>the pl<br>age m<br>geose co<br>g in p | omply with the o support the to set out your of St His of Comments of the recycling of greenbell on a real to route 8 orther toute 8 orther soute 8 orther 8 | e duty to legal of the legal of | compliance ments.  Sould be has been belts defelict a we specified with the work of the work of the workers. The workers of th | e. Please or sour | e be as precise as adness of the Local of the Local of the Local of the local of cours being of the local of cours being | Plan, please also  Its population estima 1981. Where are all regereration by Using greenbelt fails the purpares of the green of school places, doctor g encorraged because |
| of the o<br>Any ne   | IACK<br>CCEIS<br>CESSOI   | of facility<br>to the site<br>y highway  | on e<br>U wa   | ithe B   | Illinge<br>be w   | ed of Garnood  | of R of would be inadequently to the   |
| There  | is no<br>horine   | O STAILINI   | nt o   | of comm  | non G             | around wilds   | nowe got sebong/snews necessary  |

| Delere Mis   | land ,  | wom  | the  | prop  | Posed   |   |
|--|---|--|--|---|---|---|
| semoval Gor  | n the   | ' Gre  | enbe   | (E  |   |   |
|  |   |  |  |   |   |   |
|  |   |  |  | Please continu  | ue on a separat   | te sheet if neces                               |
| rmation necessary to supp<br>not normally be a subseques<br>esentation at the publication<br>for this stage, further subr  | oort/justify the replent opportunity to stage.  missions will be  | oresentation<br>to make furt<br>only at the  | and sugge<br>her represe   | ested modi<br>entations b                                     | fication, as<br>ased on the                                 | there<br>e original                             |
| ase note: your representate rmation necessary to suppose not normally be a subseque resentation at the publication of this stage, further subsequent this stage, further subsequent his sues he/she identifies of the exameter of the exameter to the stage of the exameter to suppose the stage of the stage o | port/justify the replient opportunity if on stage.  missions will be for examination  seeking a modi                              | oresentation<br>to make furt<br>only at the<br>n.<br>fication; do  | and sugge<br>her represe<br>request of<br>you cons                                 | ested modi<br>entations b                                     | fication, as<br>ased on the<br>ector, base                  | there<br>e original<br>ed on matte              |
| rmation necessary to supp not normally be a subseque resentation at the publication of this stage, further subraction is a subsequent this stage, further subraction is subsequent to the subsequent this stage, further subraction is subsequent to the subsequent this subsequent to the subsequent this sub | port/justify the replient opportunity to stage.  missions will be for examination seeking a modification? (the helparticipate     | oresentation<br>to make furt<br>only at the<br>n.<br>fication; do  | and sugge<br>her represe<br>request of<br>you cons<br>ublic)                       | ested modi<br>entations b<br>f the Insperience<br>ider it nec | fication, as<br>ased on the<br>ector, base                  | there e original ed on matte                    |
| rmation necessary to suppont normally be a subseque esentation at the publication of the stage, further substitutes he/she identifies.  If your representation is the oral part of the exame No, I do not wish to at the oral examination of the  | port/justify the replient opportunity to stage.  missions will be for examination  seeking a modifination? (the helparticipate on | oresentation to make furt only at the only | and sugge<br>her represe<br>request of<br>you consublic)  Yes, I wish<br>examinati | ested modi<br>entations b<br>f the Insperience<br>ider it nec | fication, as ased on the ector, base essary to poste at the | there e original ed on matte  participate a     |
| rmation necessary to suppont normally be a subseque esentation at the publication of the stage, further substitutes he/she identifies.  If your representation is the oral part of the exame No, I do not wish to at the oral examination of the  | port/justify the replient opportunity to stage.  missions will be for examination  seeking a modifination? (the helparticipate on | oresentation to make furt only at the only | and sugge<br>her represe<br>request of<br>you consublic)  Yes, I wish<br>examinati | ested modi<br>entations b<br>f the Insperience<br>ider it nec | fication, as ased on the ector, base essary to poste at the | there e original ed on matte  participate a     |
| rmation necessary to supp<br>not normally be a subseque<br>resentation at the publication<br>or this stage, further subrations<br>issues he/she identifies<br>If your representation is<br>the oral part of the exam   | port/justify the replient opportunity to stage.  missions will be for examination  seeking a modifination? (the helparticipate on | oresentation to make furt only at the only | and sugge<br>her represe<br>request of<br>you consublic)  Yes, I wish<br>examinati | ested modi<br>entations b<br>f the Insperience<br>ider it nec | fication, as ased on the ector, base essary to poste at the | there e original ed on matte  participate  oral |

Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

1800756M

1 3 MAR 2019



# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: www.sthelens.gov.uk/localplan

Please ensure the form is returned to us by no later than 5pm on Wednesday 13th March 2019. Any comments received after this deadline cannot be accepted.

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

## PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

| Your Details     (we will correspond via your agent)                                       | 2. Your Agent's Details (if applicable)  |
|--|--|
| Title: MR  | Title:   |
|  | First name:  |
|  | Last Name:   |
|  | Organisation/company:  |
|  | Address:   |
| Postcode: WN 4 OQX   | Postcode:  |
| Tel No:  | Tel No:  |
| Mobile No:   | Mobile No:   |
| Email:   | Email:   |
| Signature:   | Date: 10/03/19   |
| Please be aware that anonymous forms cannot considered you MUST include your details above | be accepted and that in order for your comments to be ve.  |
|  | stages of the St Helens Borough Local Plan 2020-2035? , publication of the Inspector's recommendations and |
| adplient of the flatty   |  |

Please note - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address. 1 view at http://www.legislation.gov.uk/ukpga/2004/5/contents

#### **RETURN DETAILS**

Please return your completed form to us by no later than 5pm on Wednesday 13th March 2019 by:

post to:

Local Plan

St.Helens Council

Town Hall

Victoria Square

St Helens WA10 1HP

or by hand delivery to:

Ground Floor Reception

St. Helens Town Hall

(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

#### **FURTHER INFORMATION**

If you require further information please see the FAQs on our website: www.sthelens.gov.uk/localplan

If you still need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk

Telephone: 01744 676190

### **NEXT STEPS**

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

### DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: www.sthelens.gov.uk/localplan

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

## **PART B - YOUR REPRESENTATION**

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

| 3. To w  | hich pa   | ırt of the Loca   | l Plan d       | oes this r   | epresent  | ation relate?  |  |
|--|---|---|----------------|--|---|--|--|
| Policy<br>P<br>A<br>O<br>6   | sire  | Paragraph/<br>diagram<br>table  |                | Policies<br>Map  |   | Sustainability Appraisal/ Strategic Environmental Assessment   | Habitats<br>Regulations<br>Assessment  |
|  |   | nts (please nar<br>relevant part/s  |                |  |   |  |  |
|  |   | sider the St He<br>the Guidance   |                |  |   |  | the Tests of Soundness   |
| Legally  | / Compl   | iant?   |                |  | Yes   | ☐ No   |  |
| Sound  | •   |   |                |  | ☐ Yes   | _<br>✓ No  |  |
| Compl  | ies with  | the Duty to Co  | operate        |  | <br>Yes   | ₩o   |  |
| Please   | tick as   | appropriate   |                |  |   |  |  |
| Plea   |   |   |                |  |   | ause it is not:<br>Tests of Soundness  |  |
| Justifie   |   | arou:   |                |  |   |  |  |
| Effecti  |   |   |                |  | 12(   |  |  |
|  |   | h National Polic  | :y?            |  |   |  |  |
| or fa<br>If yo   | ails to c<br>u wish   | omply with the  | e duty to      | o coopera<br>omplianc  | ite. <u>Pleas</u>   | Plan is <u>not legally core</u><br>e be as precise a |  |
| NOT JU<br>POPVIOR<br>PEOPLE<br>ONE OF<br>ENCOVI<br>MOSTA<br>PLACE<br>ENCOV | shiped hon of corning the policy of the corning in | The council  So Helens  ing from?  purpoves of  the recy  aib to enc  of green  this are  surgeries  browse | snow of has be | en in a content of dere will carried actions a content of the cont | tecline. It is to I'ct a  USL slig Inable other s  of for | since 1981. Who assist in what other urban is an initial to the security of exices the use cilibes   | pulation estimates the ase all the extant extant of the lack of the often of the oft |
| there  | U   | o statemen  | t of           | comma  | n gan   | d with neight  | novring OVFhorihes  ntinue on a separate sheet if necessar   |

| compliant or sound, having regard to the ma<br>relates to soundness (NB please note that ar<br>incapable of modification at examination). Yo<br>the Local Plan legally compliant or sound. It<br>suggested revised wording of any policy or t | ·   |
|---|---|
| Delete this land from the   | om the proposed threen best   |
| 767710  |   |
|   |   |
|   | Please continue on a separate sheet if necessary  |
| and issues he/she identifies for examination.   | y at the request of the Inspector, based on matters ion; do you consider it necessary to participate at gs in public) |
| No, I do not wish to participate at the oral examination  | Yes, I wish to participate at the oral examination  |
| 9. If you wish to participate at the oral part of the this to be necessary:   | he examination, please outline why you consider   |
| Neces water the large state will also see the   | enpropriate procedure to adopt to hogy those who have   |

indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.



# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

(For official use only)

Please also read the Representation Form Guidance Note that is available with this form, or online at: www.sthelens.gov.uk/localplan

Please ensure the form is returned to us by no later than 5pm on Monday 13th May 2019 Any comments received after this deadline cannot be accepted.

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

1 3 MAY 2019

## PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

| Your Details     (we will correspond via your agent)  | 2. Your Agent's Details (if applicable)  |
|---|--|
|   | Title:   |
|   | First name:  |
| Last Name: PEERS  | Last Name:   |
| Organisation/company: FLT Dewer   | Organisation/company:  |
| SUTTON CEACH  | Address:   |
|   | Postcode:  |
| Tel No:   | Tel No:  |
| Mobile No:  | Mobile No:   |
|   | Email:   |
| Signature:  | Date: 17 - 4 - 19  |
| Please be aware that anonymous forms cannot be a considered you MUST include your details above.                            | accepted and that in order for your comments to be   |
| Would you like to be kept updated of future stage (namely submission of the Plan for examination, pul adoption of the Plan) | es of the St Helens Borough Local Plan 2020-2035? blication of the Inspector's recommendations and |
| Yes (via email)   | □ No   |
| Please note - amail is the Council's preferred meth   | od of communication. If no email address is provided   |

we will contact you by your postal address.

#### **RETURN DETAILS**

Please return your completed form to us by no later than 5pm on Monday 13th May 2019 by:

post to:

Local Plan

St. Helens Council

Town Hall Victoria Square

St Helens WA10 1HP

or by hand delivery to:

Ground Floor Reception St.Helens Town Hall

(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

#### **FURTHER INFORMATION**

If you require further information please see the FAQs on our website: www.sthelens.gov.uk/localplan

If you still need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk

Telephone: 01744 676190

#### **NEXT STEPS**

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

### **DATA PROTECTION**

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: www.sthelens.gov.uk/localplan

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.



### St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at <a href="https://www.sthelens.gov.uk/localplan">www.sthelens.gov.uk/localplan</a>.

Please ensure the form is returned to us by no later than <u>5pm on Wednesday 13th March</u> <u>2019</u>. Any comments received after this deadline <u>cannot</u> be accepted.

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s).

1053

1 3 MAY 2019

## PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

| 1. Your Details   | Your Agent's Details (if applicable) (we will correspond via your agent) |
|---|--|
| Title: MRS  | Title:   |
| First Name:   | First name:  |
| Last Name: PENKETH  | Last Name:   |
| Organisation/company:   | Organisation/company:  |
| Address: 120 GARTONS LANE   | Address:   |
| Postcode:   | Postcode:  |
|   | Tel No:  |
|   | Mobile No:   |
|   | Email:   |
| Signature:  | Date: 22 3 19  |
| lease be aware that anonymous forms canno<br>omments to be considered you MUST includ |  |
| Plan 2020-2035? (namely submission of the Inspector's recommendations and adoption    | of the Plan)   |
| Yes (Via Email)   | No 🗌   |
| Please note - e-mail is the Council's preferre  |  |



## St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

(For official use only)

Please also read the Representation Form Guidance Note that is available with this form, or online at www.sthelens.gov.uk/localplan.

Please ensure the form is returned to us by no later than 5pm on Monday 13th May 2019. Any comments received after this deadline cannot be accepted.

This form has two parts;

Part A - Personal Details

Part B – Your Representation(s).

## PART A - YOUR DETAILS

Yes 🗹 (Via Email)

1 3 MAY 2019

| 1. Your Details   | 2. Your Agent's Details (if applicable)  |
|---|--|
| <del>-</del>  | (we will correspond via your agent)      |
| Title: MR   | Title:                                   |
| First Name:   | First name:                              |
| Last Name:  | Last Name:                               |
| Organisation/company:   | Organisation/company:                    |
| Address: 72 THE PASTURES  | Address:                                 |
| NEW BOLD  |  |
| Postcode: WA9 HZB.  | Postcode:                                |
| Tel No:   | Tel No:                                  |
| Mobile No:  | Mobile No:                               |
| Email:  | Email:                                   |
| Signature:  | Date: 19(4/2019.                         |
| ease be aware that anonymous forms cannot mments to be considered you MUST include  |  |
| Would you like to be kept updated of future Plan 2020-2035? (namely submission of the Inspector's recommendations and adoption of | Plan for examination, publication of the |

No 🗌

Please note - e-mail is the Council's preferred method of communication. If no e-mail

address is provided, we will contact you by your postal address.



# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at <a href="https://www.sthelens.gov.uk/localplan">www.sthelens.gov.uk/localplan</a>.

Please ensure the form is returned to us by no later than <u>5pm on Monday 13<sup>th</sup> May 2019</u>. Any comments received after this deadline <u>cannot</u> be accepted.

This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

13 WAY 2019

# PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

| 1. Your Details  | 2. Your Agent's Details (if applicable) (we will correspond via your agent) |
|--|---|
| Title: WRS   | Title:  |
| First Name:  | First name:   |
| Last Name: PENNINGTON  | Last Name:  |
| PENNINGTON Organisation/company:   | Organisation/company:   |
| Address: 72 THE PASTURGS BOLD STHELENS   | Address:  |
| Postcode: WA94ZB   | Postcode:   |
|  | Tel No:   |
|  | Mobile No:  |
|  | Email:  |
| Signature:   | Date:   |
| Please be aware that anonymous forms cannot be comments to be considered you MUST include you  |   |
| Would you like to be kept updated of future Plan 2020-2035? (namely submission of the Planspector's recommendations and adoption of the Planspector's recommendations. | lan for examination, publication of the                                     |
| Yes [ (Via Email)  | No 🗌  |
| Please note - e-mail is the Council's preferred raddress is provided, we will contact you by you   |   |



# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

0 1 MAR 2019

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: www.sthelens.gov.uk/localplan

Please ensure the form is returned to us by no later than 5pm on Wednesday 13th March 2019. Any comments received after this deadline cannot be accepted.

This form has two parts;

1. Your Details

Part A - Personal Details

Part B - Your Representation(s)

2. Your Agent's Details (if applicable)

# PART A - YOUR DETAILS

(we will correspond via your agent)

Please note that you must complete Parts A and B of this form.

| Title: M2S  | Title:  |
|---|---|
| First Name: CLERCDING   | First name:   |
| Last Name: PEPLOW   | Last Name:  |
| Organisation/company:   | Organisation/company:   |
| Address: 71 SPRINGFIELD F   | Aek Address:  |
|   | Postcode  |
|   | Tel No:  Mobile No:  Email:   |
| Signature:  | Date: 25 2119   |
| Please be aware that anonymous forms ca<br>considered you MUST include your details | annot be accepted and that in order for your comments to be above.  |
| Nould you like to be kept updated of fur  | ture stages of the St Helens Borough Local Plan 2020-2035? nation, publication of the Inspector's recommendations and |
| Yes (v <del>ia ema</del> il)  | □ No  |
| Please note - email is the Council's prefer   | red method of communication. If no email address is provided,   |

### **RETURN DETAILS**

Please return your completed form to us by no later than 5pm on Wednesday 13th March 2019 by:

post to:

Local Plan

St.Helens Council

Town Hall

Victoria Square

St Helens

**WA10 1HP** 

or by hand delivery to:

Ground Floor Reception

St. Helens Town Hall

(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

### FURTHER INFORMATION

If you require further information please see the FAQs on our website: www.sthelens.gov.uk/localplan

If you still need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk

Telephone: 01744 676190

### **NEXT STEPS**

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

### DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: www.sthelens.gov.uk/localplan

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

# **PART B - YOUR REPRESENTATION**

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

| 3. To which                                | part of the Local Pla   | an does this repre   | sentation relate?  | -17,5,7,7,7  |
|--|---|--|--|--|
| Policy<br>PAOS<br>DHA                      | Paragraph/<br>diagram<br>table  | Policies<br>Map  | Sustainability Appraisal/ Strategic Environmental Assessment   | Habitats<br>Regulations<br>Assessment  |
|  | ments (please name<br>nd relevant part/secti  | on)  |  |  |
|  | onsider the St Helen  |  | Plan 2020-2035 is:<br>Legal Compliance and   | the Tests of Soundness   |
| Legally Com                                | pliant?   |  | Yes No   | DON'T KNOW   |
| Sound?                                     |   |  | Yes 📝 No   |  |
| Complies wit                               | th the Duty to Cooper   | ate .  | Yes No   |  |
| Please tick a                              | s appropriate   |  |  |  |
| Positively Pre<br>Justified?<br>Effective? | epared?   | N<br>N   |  |  |
| Consistent with National Policy?           |   | $\overline{\triangleleft}$   |  |  |
| or fails to                                | comply with the dut   | y to cooperate. <u>Pl</u><br>Il compliance or s  | cal Plan is not legally co<br>ease be as precise as p<br>oundness of the Local   | ossible.   |
| ONS OF THE                                 | on St. Hourns have<br>longeroses of Grander<br>t and other pream Land<br>se or aremoser win | S BEEN IN DECLINE IT IS TO ASSIST IN UP INVISING GREATSELF IN L CAUSE SIGNIFICAN SOUTH AND BUE BEE | Since 1981. Where are<br>and reconsention by en<br>inits to executage This.<br>It harm to the Refere of<br>more of School O. according | THOW ESTMATES. THE ALLTHE EXTRA PEOPLE NOCHEMING THE RECYCLING OF THE GROWNSSET  STATE GROWNSE STREET STATES TO RECAUSE OF LACK OF |

| on a separate sheet if necessa          |
|---|
| dence and supporting                    |
| cation, as there<br>sed on the original |
|   |
| ctor, based on matters                  |
| ssary to participate at                 |
| ate at the oral                         |
|   |
| ne why you consider                     |
|   |

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

# PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

| Policy  | SEA<br>SEA                 | Paragraph/<br>diagram<br>table            | Policies<br>Map                |                   | Sustainability Appraisal/ Strategic Environmental Assessment         | Habitats<br>Regulations<br>Assessment |
|---------|----------------------------|---|--------------------------------|-------------------|--|---------------------------------------|
|         |                            | nts (please name<br>relevant part/section | a em                           | SEA               | GEA  |                                       |
|         |                            | sider the St Helens<br>the Guidance note  |                                |                   |  | ne Tests of Soundness                 |
| Legally | Compli                     | ant? Pow K                                | ∞w.                            | ☐ Yes             | ☐ No   |                                       |
| Sound?  |                            |   |                                | ☐ Yes             | ₩ No   |                                       |
| Compli  | es with t                  | he Duty to Cooper                         | ate                            | ☐ Yes             | No   |                                       |
| Please  | tick as a                  | ppropriate                                |                                |                   |  |                                       |
|         | e read t<br>ly Prepa<br>d? |   |                                |                   | Tests of Soundness   |                                       |
| Consist | ent with                   | National Policy?                          |                                |                   |  |                                       |
| or fai  | ls to co<br>wish to        | mply with the dut                         | y to cooperate<br>I compliance | te. <u>Please</u> | an is not legally con<br>be as precise as po<br>lness of the Local P |                                       |
| Rela    | EASE<br>M TO               | OF GREENS                                 | BELT W                         | CRES              | ause sign  | SILDUFE ]                             |

| 7 | 7. Please set out what modification(s) you consider necessary to make the Local Plan legally      |
|---|---|
|   | compliant or sound, having regard to the matter you have identified at 6. above where this        |
|   | relates to soundness (NB please note that any non-compliance with the duty to cooperate is        |
|   | incapable of modification at examination). You will need to say why this modification will make   |
|   | the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your |
|   | suggested revised wording of any policy or text. Please be as precise as possible.                |

DELETE THIS LAND FROM THE PROPOSED REMOVAL OF THE GREENBELT

Please continue on a separate sheet if necessary

**Please note:** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

19

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

THE COONCIL HA

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

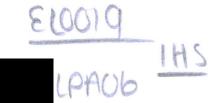
Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.



Site 1HS - Frank Phillips Representation Letter 01 03 19 - Land South of Leyland Green Road, north of Billinge Road and East of Garswood Road Jill Ashley

'planningpolicy@sthelens.gov.uk' 06/03/2019 13:46



1 Attachment



F Phillips Representation Ltr 01 03 19 Site 1HS.pdf

### **Dear Sirs**

Please find attached representation letter from myself which details my concerns in respect of the above site (1HS – land south of Leyland Green Road, north of Billinge Road and East of Garswood Road) which is being proposed.



If you wish to discuss further please do not hesitate to get in touch.

I would appreciate if you could confirm safe receipt of my letter.

Regards.

Frank Phillips

67 Leyland Green Road, Ashton in Makerfield, Nr Wigan WN4 0QU

67 Leyland Green Road Ashton in Makerfield Nr Wigan WN4 0QU



1st March 2019

To Whom It May Concern Local Plan St Helens Council Town Hall, Victoria Square St Helens Merseyside WA10 1HP P10013

Dear Sir or Madam



St Helens Borough Local Plan: Submission Draft – Site 1HS – Land South of Leyland Green Road, north of Billinge Road and east of Garswood Road, Garswood

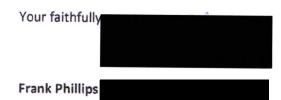
Town and Country Planning (Local Planning) (England) Regulations 2012

I write in respect of proposed developments as above and detail my concerns below:

- The effect on the infrastructure of this area. We are already experiencing traffic delays at peak periods in this area as many commuters are now using the side roads to avoid hold-ups on the motorways with long delays at Ashton Cross in spite of recent road improvements.
- There is also the effect it would have on schools/welfare in this area?
- The land marked for development is prime agriculture land but is effected by shallow mine workings, collapses have taken place frequently.
- 4. A large water main and gas main crosses the land in two separate places. Would this not somewhat restrict the development?
- There is also the effect on wild life as together with normal wildlife we have lapwings and partridges which return annually to nest here. Bats have made their home in the two barns and the derelict building on Leyland Green Road for a long time now.
- 6. The land slopes towards the properties on Leyland Green Road and it would mean that no. 62, 65 and 67 would be seriously overlooked unless some serious consideration is not given to this. May be perhaps a landscaped area could be considered?
- 7. No. 67 Leyland Green Road has a triangle rear back garden and south facing main rooms. If an area of land were made available for purchase to square the garden up this would help?

In conclusion, rather than develop large areas of land would it not be more sensible to develop smaller areas spread around or it seems a lot of brown field sites are being left undeveloped.

If you wish to discuss further please do not hesitate to get in touch.









# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

13 MAR 2019

(For official use only)

Please also read the Representation Form Guidance Note that is available with this form, or online at <a href="https://www.sthelens.gov.uk/localplan">www.sthelens.gov.uk/localplan</a>.

Please ensure the form is returned to us by no later than <u>5pm on Wednesday 13th March</u> <u>2019</u>. Any comments received after this deadline <u>cannot</u> be accepted.

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s).

# PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

Inspector's recommendations and adoption of the Plan)

address is provided, we will contact you by your postal address.

Yes x (Via Email)

| 1. Your Details                  | <ol> <li>Your Agent's Details (if applicable)<br/>(we will correspond via your agent)</li> </ol>                             |
|----------------------------------|--|
| Title: MR                        | Title:   |
| First Name:                      | First name:  |
| Last Name:                       | Last Name:   |
| Organisation/company: N/A        | Organisation/company:  |
|                                  | Address:   |
|                                  | Postcode:  |
|                                  | Tel No:  |
|                                  | Mobile No:   |
|                                  | Email:   |
| Signatur                         | Date: 1-3-2019   |
| mments to be considered you MUST | s cannot be accepted and that in order for your include your details above.  of future stages of the St Helens Borough Local |

No X

Please note - e-mail is the Council's preferred method of communication. If no e-mail

# RETURN DETAILS

Please return your completed form to us by no later than <u>5pm on Wednesday 13<sup>th</sup> March</u> <u>2019</u> by:

post to:

Local Plan

St.Helens Council

Town Hall

Victoria Square

St.Helens Merseyside WA10 1HP

or by hand delivery to:

Ground Floor Reception, St. Helens Town Hall (open Monday-

Friday 8:30am - 5:00pm)

or by e-mail to:

planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

### **FURTHER INFORMATION**

If you require further information please see the FAQs on our website at <a href="https://www.sthelens.gov.uk/localplan">www.sthelens.gov.uk/localplan</a>. If you still need assistance, you can contact us via:

Email:

planningpolicy@sthelens.gov.uk

Telephone:

01744 676190

## **NEXT STEPS**

The Council intends to submit the St. Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

### **DATA PROTECTION**

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website at <a href="https://www.sthelens.gov.uk/localplan">www.sthelens.gov.uk/localplan</a>.

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

# Now please complete <u>PART B</u> of this form, setting out your representation/comment. Please use a separate copy of Part B for each separate comment/representation.

# PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

| Policy | LPA06 | Paragraph<br>/ diagram<br>/ table | 3HS | Policies<br>Map | Sustainability Appraisal/ Strategic Environmental Assessment | X | Habitats<br>Regulation<br>Assessment |
|--------|-------|-----------------------------------|-----|-----------------|--|---|--------------------------------------|
|        |       | (please nan<br>levant part/s      |     |                 |  |   |                                      |

| 4. Do you consider the St Hel       | ens Borough Local Plan 2      | 020-2035 is:                        |  |
|-------------------------------------|-------------------------------|-------------------------------------|--|
| Please read the Guidance note       | for explanations of Legal Cor | mpliance and the Tests of Soundness |  |
| Legally Compliant?                  | Don't Know                    | Don't Know                          |  |
| Sound?                              | No -                          | No X                                |  |
| Complies with the Duty to Cooperate | No                            | No X                                |  |

Please tick as appropriate

|                                  | is <u>unsound,</u> is it because it is not:<br>explanations of the Tests of Soundness |
|----------------------------------|---|
| Positively Prepared?             | X   |
| Justified?                       | X   |
| Effective?                       | X   |
| Consistent with National Policy? | X   |

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound</u> or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

I vehemently object to this site being removed from protection as designated, Green belt. From the late 1800's, the site was the farm and grounds, that supplied crops and vegetables, for the former Rainhill Mental Hospital. In the mid 1990's work, began, to transform the site into a golf club, an invaluable amenity, providing sport, social and well being facilities, in addition to employing over 30 people.

However, a financial opportunity was seen, by the owners of the golf club, to sell the site at a considerable profit, to a House Building Conglomerate, for housing development. You will read many objections, but I want to mention, monetary greed. Monetary greed of the golf club owner; the greed of the builder developer, by building high priced properties; the greed of the local authority, wanting to increase council revenues, because of high band ratings imposed on expensive properties.

# I quote:

"The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence."

Government policy encourages the use of brownfield land. On protecting the Green Belt, it urges local authorities, to maximise the use of suitable brownfield sites **before considering changes to Green Belt boundaries** and sets out the conditions that must be fulfilled for "exceptional circumstances" to exist, to justify such changes.

The <u>Housing White Paper</u>, published in February 2017, reiterated the Government's commitment to the Green Belt. It also emphasised that authorities should amend Green Belt boundaries only when they could demonstrate that they had examined fully all other reasonable options for meeting their identified development requirements".

I do not believe that there are any exceptional circumstances, to justify this site being removed from protection as Green Belt.

Removing the land from Green Belt, and thereby enabling housing development will:

1. Lead to urban sprawl and combine two existing urban areas into one.

2. Lead to increasing traffic and air pollution.

3. Lead to Impact on already overcrowded Schools, Hospitals, GP and Dental surgeries, that are already suffering from insufficient staffing levels.

Solving the housing challenge takes more than money. Or should that be making money. The local authority, should focus on exiting urban areas, create affordable first time buyer housing, and protect our green belt, not seek to build on what little green belt land, we have in this area.

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The council should delete this land from the proposed removal from the greenbelt, therefore abiding with the National Planning Policy Framework (2019)

The council should not consider removing this land from green belt to place in safeguarded

Please continue on a separate sheet if necessary

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

No, I do not wish to participate at the oral examination



9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.



# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at <a href="https://www.sthelens.gov.uk/localplan">www.sthelens.gov.uk/localplan</a>.

Please ensure the form is returned to us by no later than <u>5pm on Monday 13<sup>th</sup> May 2019</u>. Any comments received after this deadline <u>cannot</u> be accepted.

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s).

0/00 13 MM 5019

# PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

| 1. Your Details  | Your Agent's Details (if applicable) (we will correspond via your agent)  |
|--|---|
| Title: MRS   | Title:  |
| First Name:  | First name:   |
| Last Name: Phulps  | Last Name:  |
| Organisation/company:                                      | Organisation/company:   |
|  | Address:  |
|  | Postcode:   |
|  | Tel No:   |
|  | Mobile No:  |
|  | Email:  |
| Signature:   | Date: 3/5/19  |
|  | s forms cannot be accepted and that in order for your MUST include your details above.  |
| Plan 2020-2035? (namely sub<br>Inspector's recommendations | odated of future stages of the St Helens Borough Local omission of the Plan for examination, publication of the and adoption of the Plan) |
| Yes 🗹 (Via Email)  | No 🗌  |
| Please note - e-mail is the Co                             |   |

WA9 4FZ

Dear Sir / Madam.

As an extremely concerned resident of Bold, I write in response to the recently published St Helens Borough Local Plan 2020 – 2035. From the outset I strongly oppose this plan.

My rational is due to several significant factors,

- Savid Javid Secretary of State for Home and Communities and Local Government has stated in Parliament that 'Greenbelt is absolutely sacrosanct' This was echoed in the conservative manifesto.
- Greenbelts primary purpose is to prevent urban sprawl, but in doing this it provides
  countryside to the people. It has a huge environmental value. In the face of climate change it
  has an increasingly important role in storing carbon and preventing flooding and is a vital
  economic resource for food security and soil protection.
- Britain has lost half of its wildlife a 56% decline of farmland birds between 1970 and 2015.
   Since 2016 the number of critically endangered species in the UK has reached 165. The UK now considered one of the most nature depleted countries in the world. These fields are home to may of these species, and development of these fields will decimate their habitat.
- It should be noted that for every new house built on greenbelt land it is estimated that between four and seven additional car trips would be generated per week.
- In St Helens 936 houses have been classed as long-term empty. St Helens Council Tax figures from October 2018 show that there were 2853 unused homes in the borough.

In view of the above, the following areas,

LPSD 4HA **2988 Houses** and LPSD 5HA **569 Houses**, must be removed from the Local Borough Plan.

Yours faithfully,

